

Privacy Notice

HackenAI Inc.

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At HackenAI Inc., we care about the privacy of your data and are committed to protecting it. This Privacy Notice (“Notice”) is here to help you to understand how your personal data processed and what happens to it when you're using HackenAI App (“App”) which may be downloaded from App Store and Google play.

1. Who we are?

We are HackenAI Inc. registered at 251 Little Falls Drive, Wilmington, New Castle County, Delaware, 19808, USA. In this document, we will refer to ourselves as “HackenAI”, “we” or “us”. You may contact us via email at privacy@hacken.ai. in case you have any questions in relation to your personal data.

If you are a resident of the European Economic Area you may contact our representative via email hai-privacy@hacken.io or via regular mail at Harjumaa, Tallinn linn, Kai tn 1-5M, 10111, Estonia.

2. What data do we collect?

HackenAI provides cybersecurity solutions to protect your data. Since we are unable to protect our data without having you disclose it to us, we will require you to provide some of your personal data to register an Account with us. Apart from collecting data directly from you, we will also receive some data automatically through your device. In this section we will describe what data kinds of data we collect.

2.1. Automatically collected data.

We need this data to operate, maintain and improve our App. Such data includes:

- **Technical data:** IP address, device brand, device ID, device type, manufacturer and the model of a device, device OS, OS version, mobile service carrier.
- **Usage data:** screens opened, features used, content viewed, areas of App visited.

2.2. Data you give us.

To use our App you will need to provide us with certain data:

- **Registration data.** Email address.
- **Additional data.** You may add additional email addresses to monitor them. We will notify you if any of them will get compromised.

Note, when you register an account your email address will automatically connect to our Password Manager. All of the accounts which you have registered via same

email which you've used to create HackenAI Account will be interconnected. This means that if one of your account will get compromised, we will notify you so that you can change the password and secure it.

3. Why do we use your data?

3.1. Provide you our App. We use your personal data to create an Account so that you may gain access to our App and its features. Also, we use your email as one of the factors in two factor authorization. Technical data is used to provide you with greater security. The legal basis of processing is performance of a contract.

3.2. Improve our App. We may use some of collected personal data to improve our App, including: to make analysis and statistics, to develop new products, to enforce our Terms & Conditions. We rely on legitimate interest as a legal ground for processing, when we use your data for processing activities which does not override your rights and freedoms.

3.3. Marketing. In case you provide us with your consent we will use your data for direct marketing purposes. If we use consent as a legal basis for processing, you will have a choice to opt-out from any processing activity. You may withdraw your consent at any time by sending us an email to us at privacy@hacken.ai.

3.4. Compliance with legal obligations. We may be obliged by the law to process certain data. We rely on compliance with legal obligations when processing is statutory requirement.

4. How do we share and disclose data?

We may share your personal data under the following conditions:

4.1. Safety, Legal purposes, and Law enforcement. We will disclose your personal data to third parties to the extent necessary to:

- comply with a government request, a court order or applicable law;
- defend ourselves against third-party claims;
- assist in fraud prevention or investigation

4.2. Business transfers. We will not sell your personal data to any company or organization. However, we may transfer your personal data to a successor entity. In such event, we will notify you before your personal data is transferred and becomes subject to a different privacy statement.

4.3. With your consent. In cases where you have provided your consent, we may share your personal data, as described at the time of consent.

4.4. Service providers. We use third parties for the processing of personal data on our behalf. For example, host, manage and service our data, distribute emails, research, and analysis, etc. When using third-party service providers we enter into agreements that require them to implement appropriate technical and organizational measures to protect your personal data.

5. How do we handle your data?

5.1. Security. We provide industry-standard physical, electronic, and procedural safeguards to protect personal data we process and maintain. Data which we maintain is encrypted via AES-256. Moreover, data which we receive is available only to authorized employees. Also, most of the data we receive is being encrypted before it even reaches us, therefore we do not have an access to it.

If you have a reason to believe that your interaction with our App is no longer secure, please immediately notify us by contacting us in writing at privacy@hacken.ai.

5.2. Retention of your personal data. We retain your personal data for as long as necessary to fulfill the purposes described in this Notice. Usually we retain your personal data for as long as you keep using our App. If you stop using our App, we will deem your Account inactive after 12 months. We will erase inactive accounts. However, we may keep some data for our backups and to comply with our legal obligations.

6. How can you manage your personal data?

If you would like to access, review, update, rectify, and delete any personal information we hold about you, or exercise any other of your rights such as a right to object or restrict processing and a right to data portability, you can email us to privacy@hacken.ai. In case you are unhappy with how we handle your data, you have a right to lodge a complaint with a supervisory authority.

7. Policy towards minors

We do not knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, please do not attempt to send any personal data about yourself to us. If we learn that we have collected personal data from a child under age 16, we will delete that information as quickly as possible. If you believe that a child has disclosed data to us, please contact us at privacy@hacken.ai.

8. Data transfers.

In the course of our operations, we may need to process your data outside of the country in which you reside. In such a case, we will use appropriate safeguards to ensure that your personal data will remain protected.

9. How do we update this notice?

Applicable law and our practices change over time. If we decide to update our Privacy Notice, we will post the changes in our App. If we materially change the way in which we process your personal data, we will provide you with prior Notice, or where legally required, request your consent prior to implementing such changes. We strongly encourage you to read our Privacy Notice and keep yourself informed of our practices.

10. Notice to California users

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), we are providing the following details regarding the categories of personal data about California residents we have collected or disclosed within the preceding 12 months.

11. What data do we collect?

We collect the following categories of personal data:

- Identifiers, such as your email address, as well as IP addresses, device IDs, anonymous HackenAI user IDs, and other similar identifiers.

12. Why we disclose data?

We disclose some of your personal data, including to our service providers and affiliates, for a range of operational business purposes, including to:

- operate and maintain the App and your account;
- market and sell our products and services;
- perform research and development;
- perform data and business analytics;
- detect and prevent fraud or abuse;
- perform identity verification;
- perform security and other risk testing;
- undertake quality assurance measures;
- maintain our systems and infrastructure;
- comply with law or exercise or defend legal claims;
- perform accounting, audits and other internal functions; and
- otherwise operate our business and achieve our business objectives.

According to CCPA “sell” is a rather broad term. However, we want to notify you that **we do not “sell” personal data by no means.**

13. What right do California residents have?

CCPA and other California law provides California residents with the additional rights listed below. You may exercise any of the rights described in this section by contacting us at privacy@hacken.ai. Please note that we may ask you to verify your identity before taking further action on your request.

13.1. Right to Access: You have the right to know and access what data we have collected about you over the past 12 months, including:

- categories of personal data we’ve collected about you;
- categories of sources from which the personal data is collected;
- business or commercial purpose for collecting your personal data;
- categories of personal data about you which we shared and/or sold;
- categories of third parties we have shared or sold personal data to;
- specific pieces of personal data we have collected about you.

13.2. Right to Delete: You have the right to request that we delete personal data we have collected from you (and direct our service providers to do the same). In some instances, however, we may decline to honor your request where an exception applies.

13.3. Right to Opt Out: You have the right to opt-out of any future “sale” of personal information about you by clicking here or by adjusting your Settings in the “Settings” tab.

13.4. Other Rights: You can request certain information about our disclosure of personal data to third parties for their own direct marketing purposes during the preceding calendar year. This request may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above.