

1inch Network Interface Privacy Policy

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1inch Network, accessible at: <https://1inch.io>, one of its main priorities is the privacy of participants who are visitors of <https://1inch.io> (the “Interface”). 1inch Network does its best to collect as minimum Personal Data as possible. Still, it’s quite a task not to collect it at all. That is why this Privacy Policy document contains types of data that is collected, used, and recorded by Interface.

1inch Network Interface backed by 1inch Foundation located at: Quality Corporate Services Ltd., Suite 102, Cannon Place, P.O. Box 712, North Sound Rd., Grand Cayman, KY1-9006 which is the controller for your Personal Data within the scope of this Privacy Policy. The 1inch Foundation decides “why” and “how” your Personal Data is processed in connection with the Interface. If you have additional questions or require more information about this Privacy Policy, do not hesitate to contact foundation@1inch.io.

This Privacy Policy applies only to the Interface activities and is valid for participants who are visitors to the Interface with regards to the Personal Data that they share and/or which is collected within the Interface. This Privacy Policy is not applicable to any Personal Data collected offline or via channels other than the Interface. Please read this Privacy Policy carefully to understand our policies and practices regarding your data and how it will be treated by the Interface.

IF YOU DO NOT HAVE THE RIGHT, POWER AND AUTHORITY TO ACT ON BEHALF OF AND BIND THE BUSINESS, ORGANIZATION, OR OTHER ENTITY YOU REPRESENT, PLEASE DO NOT ACCESS OR OTHERWISE USE THE INTERFACE.

IF YOU ARE INTERESTED IN HOW WE USE COOKIES AND YOU CAN CHANGE YOUR COOKIE CHOICE, PLEASE SEE SECTION 5 “COOKIES AND AUTOMATICALLY COLLECTED DATA”

1. Changes to this Agreement

If our data processing practices change, we will update this Privacy Policy accordingly to let you know of them upfront and give you a possibility to either provide your consent, object to a particular processing, or undertake other action you are entitled to under the applicable regulation. Please keep track of any changes we may introduce to this Privacy Policy. Your continued access to and use of the Interface constitutes your awareness of all amendments made to this Privacy Policy as of the date of your accessing and use of the Interface. Therefore, we encourage you to review this Privacy Policy regularly as you shall be bound by it. If, for some reason, you are not satisfied with our personal data processing practices, your immediate recourse is to stop using the Interface. You do not have to inform us of this decision unless you intend to exercise some of the data protection rights stipulated by GDPR and defined below in this Privacy Policy.

2. Eligibility

Age. By accessing our using the Interface, you represent and warrant that you are at least eighteen (18) years of age. If you are under the age of eighteen (18), you may not, under any circumstances or for any

reason, use the Interface. Please report to us any instances involving use of the Interface by individuals under the age of 18, should they come to your knowledge.

3. Applicability

This Privacy Policy applies to all your interactions with us via the Interface and your interactions with us in connection therewith.

Below is the categories of our processors used on the Interface due to an internal data processing roadmap providing a brief grasp of our data processing activities with regard to each piece of the Personal Data we may collect through the Interface, as well as your place in every data processing event. It can be requested at foundation@1inch.io. Below are the categories of our processors which can access and process your Personal Data through the Interface:

- 1) Technical maintenance vendors;
- 2) Project and team management vendors;
- 3) Merch products delivery vendors;
- 4) Communication vendors;
- 5) Analytics, statistics, performance, marketing vendors.

4. Data processing in connection with the Interface

Types of Data Collected

To the maximum extent possible, Interface tries to collect as minimum Personal Data from you as possible. Personal Data we collect:

- Email address, your name, and any other Personal Data you provide to us when communicating with us. Such Personal Data is used only for communication with you;
- The Personal Data that you are asked to provide and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Data;
- IP address, MAC address, log files, domain server, data related to usage, performance, website security, traffic patterns, location information, browser and device information – only when you are using the dApp;
- Wallet addresses (public blockchain addresses), transaction, and balance information (blockchain data) that is accessible when interacting with the Interface; We use public Blockchain addresses to identify a user's journey through our product. We group and analyse these user journeys collectively in order to improve our product user experience. We do not use this data for any purpose at an individual user level. The legal basis for this processing is our legitimate interests, such as monitoring and improving the Interface, the proper protection of the Interface against risks and partly the contract performance basis to provide you the Interface. Note that we are not responsible for your use of any of the blockchain and your data processed in these decentralized and permissionless networks;
- Log Files. Interface follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and this kind of Personal Data may also be collected as a part of hosting services' analytics. The data collected by log files may include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These kinds of data may be linked to data that is personally identifiable. The purpose of the data collection and processing is for

analyzing trends, administering the website, tracking users' movement on the website, and gathering demographic information;

- Your name and address you provide to us when ordering our merch products.

1inch Network or we may also engage third-parties advertising platforms that are triggered only when their technical features (so-called “pixels”) are enabled through the Interface. The mentioned third-parties advertising platforms may collect Personal Data of Interface’s visitors only with the purpose to optimize their advertising possibilities through their platforms, target you with their advertisements, and possibly share your data with other advertising platforms and agencies for further use.

In no event we are going to ask you to share your private keys or wallet seed. Never trust anyone or any website that asks you to enter your private keys or wallet seed.

How and Why we use your Personal Data

We may use your Personal Data listed above only for:

- Our internal and operational purposes, when: ensuring security, identifying irregular website behavior, preventing fraudulent activity and improving security at all possible levels;
- Assessing and improving the performance of the Interface;
- Analyzing our website visitors’ actions to improve our Interface (section “Cookies and Automatically Collected Data”);
- Analyzing the Interface behavior, including via: Google Analytics (please refer to [Google’s Analytics` Policy](#) for more information);
- Delivering our merch products to users that ordered them;
- Send you marketing, advertising, informational emails;
- Find and prevent fraud.

To clear any doubts, we may use Personal Data described above or any other Personal Data:

- On the basis of contract performance or necessity to enter into a contract (where the Personal Data is required for us to perform our undertakings and obligations in accordance with a contract we are entering into when you use our services, or where we are at the negotiations phase);
- On the basis of our or our processors’ legitimate interests to protect the Interface, prevent any malicious and harmful activities to the Interface, maintain our technical systems healthy and secure, improve services and products by using aggregate statistics;
- To respond to legal requests of authorities, provide information upon court orders and judgments, or if we have a good-faith belief that such disclosure is necessary and abide the law in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders, and including other similar statutory obligations we or our processors are subjected to;
- On the basis of your consent; and
- On other legal bases set forth in the personal data protection laws.

Disclosure of Data

In continuation of legal bases for collecting and processing the Personal Data, We may disclose any Personal Data about you:

- In connection with a merger, division, restructuring, or other association change; or
- To our subsidiaries or affiliates (if any) only if necessary for operational purposes.

If we must disclose any of your Personal Data in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, we may not be able to ensure that such recipients of your Personal Data will maintain the privacy or security of your Personal Data.

Data Retention Period

1inch Network and/or we maintain Personal Data exclusively within the time needed to follow prescribed herein legal purposes. When we no longer need Personal Data, the limitation period for storage of such Personal Data has expired, you have withdrawn your consent or objected to our or our processors' legitimate interests, we securely delete or destroy it unless the statutory requirements we, our processors or other controllers are subjected to stipulate otherwise. Aggregated data, which cannot directly identify a device/browser (or individual) and is used for purposes of reporting and analysis, is maintained for as long as commercially necessary till you object to processing of such data or withdraw your consent. In any case, we are going to erase data about the user's name and address after lapse of 30 calendar days from the date of order of 1inch Network merch products.

Sometimes legal requirements oblige us to retain certain data, for specific purposes, for an extended period of time. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention;
- Financial monitoring and record-keeping;
- Complying with legal or regulatory requirements;
- Ensuring the continuity of your interaction with the Interface.

Your Inquiries

You may contact us by email at the following email address: foundation@1inch.io; We use the data that you provide in an email to us, which you may give voluntarily, only in order to answer your question or to reply to your email in the best possible manner.

5. Cookies and Automatically Collected Data

As you navigate through and interact with our Interface, we may ask your consent to use cookies, which are small files placed on the hard drive/browser of your computer or mobile device, and web beacons, which are small electronic files located on pages of the Interface, to collect certain information about devices you use, browsing actions, and patterns.

The data automatically collected from cookies and web beacons may include information about your web browser (such as browser type and browser language) and details of your visits to the Interface, including traffic data, location data and logs, page views, length of visit, and website navigation paths as well as information about your device and internet connection, including your IP address and how you interact with the Interface. We collect this data in order to help us improve the Interface and interaction with it.

The information we collect automatically may also include statistical and performance information arising from your use of the Interface. This type of data will only be used by us in an aggregated and pseudonymized manner.

You can choose to disable cookies through your individual browser options. To get more detailed information about cookie management with specific web browsers, please find it on the browsers' respective websites:

- For Google Chrome browser please refer to these [instructions](#);
- For Firefox browser please look up [here](#);
- For Safari browser please [visit](#);
- For Internet Explorer browser please [refer to](#).

6. Your rights under GDPR

Under certain circumstances, you may have a number of privacy rights concerning the use, storage, and processing of your Personal Data (e.g., the right to delete your data). Here is a list of privacy rights:

- **Right to be informed** - we are publishing this Privacy Policy to keep you informed as to what we do with your Personal Data. You can ask us for Personal Data regarding you that we keep at any time. This information concerns, among other things, the data categories we process, for what purposes we process them, the origin of the data if we did not acquire them directly from you and, if applicable, the recipients to who we have sent your data.
- **Right of access** – You may ask us whether we process your Personal Data and you have the right to request a copy of the data we hold about you.
- **Right of rectification** – You have the right to correct inaccurate or incomplete data about you.
- **Right to be forgotten** – You can ask for the Personal Data that we hold about you to be erased from our system and we will comply with this request unless we have a legitimate reason, legal requirement, and other statutory basis not to do so. Even if we can delete (erase) the Personal Data subjected to our active (ongoing) processing activities and cease its processing, we will nevertheless retain this particular Personal Data in our backup and archive storages to fulfil our statutory and other requirements.
- **Right to restriction of processing** – where certain conditions apply, you can ask us to 'block' the processing of your Personal Data.
- **Right to data portability** – You have the right to have the data we hold about you transferred to another organization and to receive Personal Data in a structured, commonly used format. Please apply to: foundation@1inch.io to find out whether we currently support the provision of the portable file containing Personal Data we process about you.
- **Right to object** - You can object to the processing of your data by applying to: foundation@1inch.io at any time for reasons that arise from your special situation provided the data processing is based on our legitimate interest or that of a third party, or where we carry out profiling, use machine learning or automated decision-making algorithms. In this case, we will no longer process your Personal Data. The latter does not apply if we are able to prove there are compelling, defensible reasons for the processing that outweigh your interests or we require your data to assert, exercise or defend legal claims.
- **Right to withdraw consent** - withdraw the consent you gave us with regard to the processing of your Personal Data for certain purposes.

- **Right to complain** - we take your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately, you have the right to submit a complaint to the data privacy protection authorities responsible. You can send your complaints to the EEA supervisory authority of your country of residence.

Please email to: foundation@1inch.io with any questions about exercising any of the above rights. If You wish to learn more about the GDPR and Your rights, the [Information Commissioner's Office](#) website is a reliable source.

7. Privacy of children

Our Interface is not directed to collect any data from people under the age of 18. We do not knowingly allow anyone under 18 years old to submit any data to our Interface. If you believe your child may have provided us with their data, you can contact us using the information in this Policy and we will delete the data from our Interface.

8. Transfer of Personal Data

Transfers to third countries, shall be made subject to appropriate safeguards, namely Standard Contractual Clauses adopted by the supervisory authority and approved by the Commission. Copy of the foregoing appropriate safeguards may be obtained by you upon a prior written request sent. We may instruct you on further steps to be taken with a purpose of obtaining such a copy, including your obligation to assume confidentiality commitments in connection with being disclosed the 1inch Foundation proprietary and personal information of third parties as well as terms of their relationships with the Interface.

Keep in mind that the use of Interface based on public blockchains intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of Personal Data, in particular when blockchain data is combined with other data. Because blockchains are decentralized or third-party networks which are not controlled or operated by us, we are not able to erase, modify, or alter Personal Data from such networks.

9. Data Integrity & Security of Processing

We take data security very seriously. We work hard to protect the Personal Data you provide us from loss, misuse, or unauthorized access. We utilize a variety of safeguards such as encryption, digital and physical access controls, non-disclosure agreements, and other technical and organizational measures to protect the Personal Data submitted to us, both during transmission and once it is at rest.

Please note that no electronic transmission, storage, or processing of Personal Data cannot be entirely secure. We cannot guarantee that the security measures we have in place to safeguard Personal Data will never be defeated or fail, or that those measures will always be sufficient or effective. Therefore, although we are committed to protecting your privacy, we do not promise, and you should not expect that your Personal Data will always remain private or secure.

10. Supervisory authority oversight

If you are a data subject whose data we process, you may also have the right to lodge a complaint with a data protection regulator in one or more of the European Union member states. [Here](#) you can find a list of data protection authorities in Europe.