

Privacy Notice

HackenProof

PREPARED BY

hProof OÜ

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REGISTERED ADDRESS

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PRIVACY NOTICE HACKENPROOF

Last update: **January 28, 2026**

hProof OÜ takes care of your personal data and does everything possible to protect it. This Privacy Notice is written to help you understand what your personal data is collected, stored and used, and what hWebsitens to it when you use our website hackenproof.com (“Website”).

CATEGORIES OF DATA SUBJECTS

In brief: Using our Website and its functions you can be for us: Visitor

When you interact with our Website you become the User. As a User or in the process of receiving our services, you can become:

Category of data subject	Description
Visitor	Users, who only browse HackeProof.
Newsletter subscribers	Users who submitted their emails to receive updates on Hacken activity
Hacker	User, who has created a Hacker’s account to provide cybersecurity services through HackenProof and receive rewards.
Company	User, who has created a Company’s account to get the cybersecurity services by Hacken, provided with the involvement of the Hackers from HackenProof.

CONTACTS AND CONTROLLER INFORMATION

We provide you with contact information

Data controller hProof OÜ

Address Harju maakond, Tallinn, Kristiine linnaosa, Mustamäe tee 6b, 10616, Estonia

Support email info@hackenproof.com – for general inquiries.
privacy@hacken.io – for privacy inquiries.

PERSONAL DATA THAT WE PROCESS

- The data we process is divided into categories: automatically collected data, data provided to us by our data subjects and data received from third parties.
- Verification of Hackers is covered by KYC Privacy Policy.
- Third parties from whom we receive data are publicly available.

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Pay attention!

The services are not directed to individuals under 18. We do not knowingly collect personal data from children under 18. If we become aware that a child under 18 has provided us with personal data, we will take steps to delete such information. If you become aware that a child has provided us with personal data, please contact us .

We may process personal data on the following lawful basis:

- 1. Performance of the contract** - the processing of personal data is necessary for the conclusion and performance of a contract. Failure to provide data that is processed on a "performance of the contract" basis will result in the inability to register and provide our services;
- 2. Legitimate interest** - for processing that is reasonable for the user and necessary for the development of our services.
- 3. Consent** - for additional processing for specific purposes

Your data will not be processed for purposes other than those for which it was collected, as described in the tables below.

AUTOMATICALLY-COLLECTED DATA (VISITOR`S DATA)

When you visit our Website, some data is automatically collected. Learn more about the purposes and basis for data processing:

When	Purpose	Lawful basis	Data
You use our Website	<ul style="list-style-type: none"> • Website operation • Analytics • Statistics 	Legitimate interest	<ul style="list-style-type: none"> • Technical data • IP address • Device type • account data • mobile operator • device operating system • session ID

The data is generated or collected automatically while using the Website			<ul style="list-style-type: none"> • phone model • serial number • APNs token • device ID
The data is generated or collected automatically while using the Website	Stronger protection	Legitimate interest	<ul style="list-style-type: none"> • Website usage data • permissions and settings • seed phrase • flow balance • membership level

DATA WE CAN GET FROM THE HACKER

When	Purpose	Lawful basis	Data
Registration data (necessarily)	Create an account	Performance of the contract	<ul style="list-style-type: none"> • Full name • Profile picture • Nickname • Email • Wallet number • Type of Account (Hacker)
Settings data	Usability	Consent	Preferred language and other user-defined account preferences related to platform usability.
Contact data (necessarily)	Restoring account access	Performance of the contract	Email address used for account recovery, security notifications, and contractual communications.
Verification data (necessarily for private programs)	Filling out your account	Performance of the contract	Identification and verification information required for compliance purposes, including personal identification data and supporting documentation, as further described in the applicable KYC Privacy Policy
Report data	Perform contractual obligation	Performance of the contract	Information submitted in vulnerability reports, including technical descriptions, attachments, metadata, timestamps, and any information necessary to assess, validate, and process submitted reports.
Payment data	Perform contractual obligation	Performance of the contract	Payment-related information necessary to process rewards and contractual payments, including transaction identifiers, wallet or payout details, payment status, and tax-related information where required by law.

(Please note that payment card details are processed exclusively by third-party payment service providers and are not stored by the platform.)

Data storage limitation

Data processed on the basis of the performance of the contract.	Stored for up to 3 years after the deletion of your account.
Data processed on the basis of your legitimate interest.	Stored for up to 2 years after the collection of the data.
Data processed on the basis of your consent.	Stored until you withdraw your consent.

Data received from third parties

Also, we can collect some data from third parties. We share your data with the service providers who, for example, help us:

- operate, develop, and improve the features and functionality of our Website;
- provide you with their services;
- communicate with you as described elsewhere in this Privacy Notice.

The scope of the data collected, the purposes and the legal basis for the processing are determined by the respective privacy documents of these parties:

Third parties	Description	Link to privacy documents
Facebook	We use Facebook for communication and support	Privacy
LinkedIn	We use LinkedIn	Privacy
Twitter	We use Twitter for communication and support	Privacy
Google	We use Google products to organize our work and communication	Privacy

Note: we can get data from third parties, but we won't necessarily get it. It all depends on your settings and the features you use. For example, we can receive data if you communicate with us through these third parties.

DATA SHARING WITH THIRD PARTIES: INFORMATION ON DATA TRANSFER

In brief: We have the ability to transfer and disclose your data legally;
We use Websiteropriate safeguards to transfer your data.

General

We can share your personal data with third parties without any harm to you and in full compliance with Websitellicable law. In addition, we have implemented organizational and technical measures to ensure the security of personal data during data transfer to third-party.

Third parties	Description
Analytics tools.	We use analytics tools to understand and promote our business
Messengers	We use messengers to communicate with you in ways that are convenient for you
Contractors and providers of the services on the Website.	We cooperate with contractors to provide their services on our Website, develop and improve the features and functionality of our Website, fulfill your support requests, etc
Providers of the services our team use	We use CRM systems, messengers, and other services in our organization to provide you with our services.
State authorities, courts, law enforcement agencies, etc	Compliance with the law. We may be obliged to transfer some of your data to tax authorities, courts, law enforcement agencies, and other governmental bodies to the extent that it is necessary. <ul style="list-style-type: none">• to comply with a government request, court order, or Websitellicable law• to prevent unlawful use of our Website;• to protect against claims of third parties• to help prevent or investigate fraud.

Note: we will ask for your consent if the transfer of data is not part of a contract. If a transfer is necessary, we also undertake to obtain permission from the regulatory body.

Financial transactions relating to our services are handled by our third party service providers. We will share your wallet public address (which is publicly visible due to the public nature of distributed ledger systems) with our payment services providers for the purposes of processing your payments. We do not share your email address or any other personal data with our third party service providers.

When you interact with our payment services providers or any other third parties websites and Websitelications, you are no longer governed by this Policy. We have no control over, do not review and cannot be responsible for these service providers websites, Websitelications or their content.

Data collection

The personal data that we collect is stored on servers in Estonia. If we need a data transfer, we will take the necessary steps to protect it.

We will transfer your personal data outside the EEA to provide service with all the Websiteropriate safeguards to protect your personal data.

SECURITY

We use technical, physical and organizational measures to protect your data

➤ Policies and instructions	➤ Limited access to premises	➤ Two-factor authentication
➤ Contractor training	➤ Stress-tests	➤ encryption_technologies
➤ Transfer protection	➤ Application software security	➤ Backup
➤ Non-disclosure agreements	➤ Inventory of Authorized and Unauthorized devices	➤ Firewalls

DATA SUBJECTS RIGHTS

European Economic Area residents

You, as a data subject, have the right to interact with your data directly or through a request to us. This section describes these rights and how you can exercise them:

The right	Description
Right to access	You can request an explanation of the processing of your personal data.
Right to rectification	You can change the data if it is inaccurate or incomplete.
Right to erasure	You can send us a request to delete your personal data from our systems. We will remove them unless otherwise provided by law.
Right to restrict the processing	You may partially or completely prohibit us from processing your personal data.
Right to data portability	You can request all the data that you provided to us, as well as request to transfer data to another controller.
Right to object	You may object to the processing of your personal data.
Right to withdraw consent	You can withdraw your consent at any time.
Right to file a complaint	If your request was not satisfied, you can file a complaint to the regulatory body.

Note: To exercise other rights please [contact us](#). To protect your privacy, we will take steps to verify your identity before fulfilling your request. We will do our best to respond promptly and in any event within one month of the email receipt.

If your request is not satisfied, you can file a complaint with the [regulatory body](#) located in your country of residence.

UK residents enjoy the same rights but may lodge a complaint at the other Authority in the UK – Information Commissioner’s Office.

You can contact them at 0303 123 1113 or go online at www.ico.org.uk/concerns.

United States residents

You, as data subjects, have some special privacy rights. To use them, please [contact us](#).

Please note! Depending on the state and legislative requirements, we have from 30 to 60 days to exercise your request, with the right to postpone it for 30 days more.

If your complaint is not satisfied, you can file a complaint with the [Federal Trade Commission](#).

Your rights vary depending on the laws that Websitesly to you but may include:

The right	Description
Right to access	You can request an explanation of the processing of your personal data.
Right to rectification	You can change the data if it is inaccurate or incomplete.
Right to deletion	You can send us a request to delete your personal data from our systems.
Right to restriction	You may partially or completely prohibit us from processing your personal data.
Right to portability	You can request all the data you provided to us and request to transfer data to another controller.
Right to opt out	The right to prohibit the sharing or selling of your data.
Right against automated decision-making	You have the right not to be subject to a decision based solely on automated means if the decision produces legal effects concerning you or significantly similarly affects you.
Right to lodge a complaint	If your request was not satisfied, you can file a complaint with the regulatory body.

Please note! Some states do not have privacy laws. The rights of residents of such states are governed by U.S. federal law. If your state is not on the list, please [contact us](#).

Do not sell my personal data

Under the California Consumer Privacy Act (“**CCPA**”) we **do not sell** your personal information nor use your data as a business model.

In compliance with:

- Colorado Privacy Act
- Virginia Consumer Data Protection Act
- Connecticut Data Privacy Act;
- Utah Consumer Privacy Act;
- Montana Consumer Data Privacy Act;
- Texas Data Privacy and Security Act
- Oregon Consumer Privacy Act

Hacken **does not sell** your personal data to third parties nor use your data for targeted advertising.

If you would like to record your preference that we will not sell your data in the future, please contact us via privacy@hacken.io

Do-not-track requests

California residents visiting our Website may request that we do not automatically gather and track information about their online browsing movements across the Internet.

Such requests are typically made through settings that control signals or other mechanisms that allow consumers to exercise choice regarding collecting personal data about an individual consumer’s online activities over time and across third-party websites or online services.

We currently do not have the ability to honor these requests. We may modify this Privacy Notice as our abilities change.

ACCOUNT DELETION

In order to exercise your right to erasure you can follow these steps in the Website:

Settings > Account > Delete account

Once your password is confirmed for the account deletion, the data will be permanently removed, making it impossible to restore.

UPDATE

This Privacy Notice and the relationships falling under its effect are regulated by the Regulation (EU) 2016/679 (“GDPR”).

Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on our Website.

If we make any material changes to the Privacy Notice or the Website that affect your data privacy rights, we will notify you by displaying information on the Website. If you continue using the Website after the changes come into effect, it shall be deemed that you have agreed to and accepted the updated Privacy Notice.