

HadePay Privacy Policy

This Privacy Policy describes the types of Personal Data we collect through our payments products and services (“Services”) and via our online presence, which include our main website at hadepay.com, as well as services and websites that we enable Internet users to access (collectively, our “Sites”). This policy also describes how we use Personal Data, with whom we share it, your rights and choices, and how you can contact us about our privacy practices. This policy does not apply to third-party websites, products, or services, even if they link to our Services or Sites, and you should consider the privacy practices of those third-parties.

I. Overview

HadePay obtains Personal Data about you from various sources to provide our Services and to manage our Sites. “You” may be a visitor to one of our websites, a user of one or more of our Services (“User” or “HadePay User”), or a customer of a User (“Customer”). If you are a Customer, HadePay will generally not collect your Personal Data directly from you. Your agreement with the relevant HadePay User should explain how the HadePay User shares your Personal Data with HadePay, and if you have questions about this sharing, then you should direct those questions to the HadePay User.

II. Personal Data We Collect

The Personal Data that you provide directly to us through our Sites will be apparent from the context in which you provide the data. In particular:

- When you register for a HadePay account we collect your name, email address, and account log-in credentials.
- When you fill-in our online form to contact our sales team, we collect your full name, work email, country, and anything else you tell us about your project, needs and timeline.

When you respond to HadePay emails or surveys we collect your email address, name and any other information you choose to include in the body of your email or responses. If you contact us by phone, we will collect the phone number you use to call HadePay. If you contact us by phone as a HadePay User, we may collect additional information in order to verify your identity.

If you are a HadePay User, you will provide your contact details, such as name, postal address, telephone number, and email address. As part of your business relationship with us, we may also receive financial and personal information about you, such as your date of birth and government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number).

If you are a Customer, when you make payments or conduct transactions through a HadePay User’s website or application, we will receive your transaction information. Depending on how

the HadePay User implements our Services, we may receive this information directly from you, or from the HadePay User or third parties. The information that we collect will include payment method information (such as what cryptocurrency you paid with and its address), purchase amount, date of purchase, and payment method. Different payment methods may require the collection of different categories of information.

The HadePay User will determine the payment methods that it enables you to use, and the payment method information that we collect will depend upon the payment method that you choose to use from the list of available payment methods that are offered to you by the HadePay User.

When we conduct fraud monitoring, prevention and detection activities, we may also receive Personal Data about you from our business partners, financial service providers, identity verification services, and publicly available sources (e.g., name, address, phone number, country), as necessary to confirm your identity and prevent fraud. Our fraud monitoring, detection and prevention services may use technology that helps us assess the risk associated with an attempted transaction that is enabled on the HadePay User's website or the application that collects information.

You may also choose to submit information to us via other methods, including: (i) in response to marketing or other communications, (ii) through social media or online forums, (iii) through participation in an offer, program or promotion, (iv) in connection with an actual or potential business relationship with us, or (v) by giving us your business card or contact details at trade shows or other events.

Information that we collect automatically on our Sites

Our Sites use cookies and other technologies to function effectively. These technologies record information about your use of our Sites, including:

- Browser and device data, such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the language version of the Sites you are visiting;
- Usage data, such as time spent on the Sites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Sites.

We also may collect information about your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online features and services. We use Google Analytics on our Sites to help us analyze Your use of our Sites and diagnose technical issues.

To learn more about the cookies that may be served through our Sites and how You can control our use of cookies and third-party analytics, please see our [Cookie Policy](#).

III. How We Use Personal Data

A. Our products and services.

We rely upon a number of legal grounds to ensure that our use of your Personal Data is compliant with applicable law. We use Personal Data to facilitate the business relationships we have with our Users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests. We also use Personal Data to complete payment transactions and to provide payment-related services to our Users.

B. Marketing and events-related communications.

We may send you email marketing communications about HadePay products and services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with the consent requirements that are imposed by applicable law. When we collect your business contact details through our participation at trade shows or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.

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IV. How We Disclose Personal Data

HadePay does not sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.

A. HadePay. We share Personal Data with other HadePay entities in order to provide our Services and for internal administration purposes.

B. Service providers. We share Personal Data with a limited number of our service providers. We have service providers that provide services on our behalf, such as identity verification services, website hosting, data analysis, information technology and related infrastructure, customer service, email delivery, and auditing services. These service providers may need to access Personal Data to perform their services. We authorize such service providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process on our behalf. Our service providers are predominantly located in the European Union and the United States of America.

C. Business partners. We share Personal Data with third party business partners when this is necessary to provide our Services to our Users. Examples of third parties to whom we may disclose Personal Data for this purpose are banks and payment method providers (such as credit

card networks) when we provide payment processing services, and the professional services firms that we partner with to deliver [HadePay Atlas](#).

D. Our Users and third parties authorized by our Users. We share Personal Data with Users as necessary to maintain a User account and provide the Services.

E. Corporate transactions. In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties for the purpose of facilitating and completing the transaction.

F. Compliance and harm prevention. We share Personal Data as we believe necessary:

(1) to comply with applicable law, or payment method rules; (2) to enforce our contractual rights; (3) to protect the rights, privacy, safety and property of HadePay, you or others; and (4) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

V. Your Rights and Choices

You have choices regarding our use and disclosure of your Personal Data:

A. Opting out of receiving electronic communications from us. If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our Services.

B. How you can see or change your account Personal Data. If You would like to review, correct, or update Personal Data that You have previously disclosed to us, You may do so by signing in to your HadePay account or by [contacting us](#).

C. Your data protection rights. Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Data we control about you:

- The right to request confirmation of whether HadePay processes Personal Data relating to you, and if so, to request a copy of that Personal Data;
- The right to request that HadePay rectifies or updates your Personal Data that is inaccurate, incomplete or outdated;
- The right to request that HadePay erase your Personal Data in certain circumstances provided by law;

- The right to request that HadePay restrict the use of your Personal Data in certain circumstances, such as while HadePay considers another request that you have submitted (including a request that HadePay make an update to your Personal Data); and
- The right to request that we export to another company, where technically feasible, your Personal Data that we hold in order to provide Services to you.

Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your particular situation.

D. Process for exercising data protection rights. In order to exercise your data protection rights, you may contact HadePay as described in the [Contact Us](#) section below. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Data. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country.

For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Data about you in order to provide our Services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

If you are a Customer of a HadePay User, please direct your requests directly to the User. For example, if you are making, or have made, a purchase from a merchant using HadePay as a payment processor, and you have a request that is related to the payment information that you provided as part of the purchase transaction, then you should address your request directly to the merchant.

VI. Security and Retention.

We make reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain organizational, technical and administrative measures designed to protect Personal Data within our organization against unauthorized access, destruction, loss, alteration or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please [contact us](#) immediately. If you are a HadePay User, we retain your Personal Data as long as we are providing the Services to you.

We retain Personal Data after we cease providing Services to you, even if you close your HadePay account, to the extent necessary to comply with our legal and regulatory obligations,

and for the purpose of fraud monitoring, detection and prevention. We also retain Personal Data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

VII. International Data Transfers

We are a global business. Personal Data may be stored and processed in any country where we have operations or where we engage service providers. We may transfer Personal Data that we maintain about you to recipients in countries other than the country in which the Personal Data was originally collected, including to the United States. Those countries may have data protection rules that are different from those of your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your Personal Data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data.

If you are located in the European Economic Area (“EEA”) or Switzerland, we comply with applicable laws to provide an adequate level of data protection for the transfer of your Personal Data to the US. HadePay Inc. is certified under the EU-U.S. and the Swiss-U.S. Privacy Shield Framework and adheres to the Privacy Shield Principles. For more, see HadePay’s [Privacy Shield Policy](#). In addition, we have implemented intra-group data transfer agreements which you may view upon request.

Where applicable law requires us to ensure that an international data transfer is governed by a data transfer mechanism, we use one or more of the following mechanisms: EU Standard Contractual Clauses with a data recipient outside the EEA, verification that the recipient has implemented Binding Corporate Rules, or verification that the recipient adheres to the EU-US and Swiss-US Privacy Shield Framework.

VIII. Use by Minors

The Services are not directed to individuals under the age of thirteen (13), and we request that they not provide Personal Data through the Services.

IX. Updates To this Privacy Policy and Notifications

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The “Last updated” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we

post the revised Privacy Policy on the Services. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a User, by contacting you through your HadePay Dashboard, email address and/or the physical address listed in your HadePay account.

X. Links To Other Websites

The Services may provide the ability to connect to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we strongly suggest you review. If any linked website is not owned or controlled by us, we are not responsible for its content, any use of the website or the privacy practices of the operator of the website.