

## Data Use and Privacy Policy

Date of Last Revision: **March 6, 2024**

Gather, Ltd ("**Hydro.Online**", "**we**," "**us**," "**our**") respects your privacy and is committed to protecting your Personal Information and being transparent about how we collect, use, and share your Personal Information. This Privacy Policy ("**Policy**") applies to your use of our blockchain platform ("**Platform**"), and web-traffic measurement operations ("**Operations**") as well as email group services, your browsing of this website located at [www.Hydro.Online](http://www.Hydro.Online) or to any website that includes a link or reference to this Policy ("**Website**") and to your use of our mobile applications and related services (all of the above are collectively, the "**Services**"). This Policy describes how we handle Personal Information (as described below) and the choices available to you regarding collection, use, access and how to update and correct your Personal Information.

### Use of Your Web Traffic Measurement

The Platform provides services for Hydro's clients; these services allow for the client's website(s) to read website visitor's duration on site. This process does not record personal data from your computer; but some of Hydro's clients may have other processes that they incorporate that may record some personal information that will be defined by that client's documentation. The measurement will be read safely in the browser/application without installing anything. When you leave the active window, the measurement will stop immediately.

### Corporate Client Information Collected by Hydro

It is true that Hydro collects data from its corporate clients (entities that pay to use the Services), but almost all of it is metadata that is not about the client's Personal Information, however, sometimes the data may include Personal Information that corporate clients provide on our Services while they use the Services. "Personal Information" includes information that can be used to identify you as a natural person, directly or indirectly, in particular in combination with other information available to us such as an identification number, online identifier or one or more factors specific to your identity as a natural person and may include your:

- Name;
- citizenship information;
- e-mail address;
- data about your use of the Services;
- cryptocurrency wallet address, but NOT your private keys etc.

Each visitor to and user of the Services may be identified by cookies or similar technologies (see our Cookie Policy) as well as by an IP address during their visit. The information we



collect depends on how you use our Services. As the case may be, we may also collect information indirectly through Social Networking Services (as defined below) you would be using in connection with the Services.

If you fail to provide certain Personal Information when requested, we may not be able to perform the contract we have entered into with you (such as providing the Services to you), or we may be prevented from complying with our legal obligations.

### **How we use your Personal Information**

We only collect, use, and store Personal Information for the purposes of operating our business and Services, delivering, providing, improving, and customizing our Services, sending other communications related to our business and Services, and for providing you with information, products, and services that you request from us. As the case may be, we will provide you with the basis of such legitimate purposes upon its occurrence, prior to implementation of the related processing.

Hydro.Online collects Personal Information for a variety of purposes, including the following:

- Performance of a contract to which Hydro.Online is a Party, including subscribing to our Services;
- Providing you with our Services upon your request;
- Respond to an inquiry from you, either directly from Hydro.Online or, and where applicable, subject to your prior consent, from our third-party partners;
- Providing you with customer service and support;
- Personalize the Services; and
- Improving the operation of the Services and/or help adjust the content of the Services to the general geographic location of you and for reporting purposes.

Where required or permitted by applicable law, we also use or disclose your Personal Information to limited third parties when we believe, in good faith, that such use or disclosure is reasonably necessary to (i) comply with the legal obligation bearing on Hydro.Online, (ii) enforce or apply the terms of any agreement to which we are a party, or (iii) protect the rights, property or safety of Hydro.Online, Hydro.Online's clients, or others.

### **How we share your Personal Information**

We may share your personal Information with our affiliate entities and other third party business partners, providers, vendors or contractors acting on our behalf and under our instructions, whether located inside and outside of the European Union ("EU") or the Economic Area ("EEA"), for the purposes of operating our business, delivering, improving, and customizing our Services, sending communications related to our business and Services, and when needed, with your consent.

Therefore, we may share Personal Information in the following ways:

- Within Hydro.Online and any of our affiliate entities located inside or outside of the EU/EEA, for purposes of data processing or storage;
- With Hydro.Online's business partners, vendors, authorized third-party agents or contractors to provide our products and services or facilitate transactions. Examples include, but are not limited to: processing of orders, hosting websites and providing support.
- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by another company;
- As the case may be, for further protection of your privacy, Hydro.Online will share your Personal Information in aggregated and/or de-identified form that cannot be used to identify you.

Where mandated or permitted by applicable law, regulation or legal process, we will disclose your Personal Information to law enforcement officials, government authorities or other third parties, located inside and outside of the EU/EEA, where such disclosure is in accordance with due process of law and binding upon Hydro.Online, to the extent necessary to comply with legal process or meet national security requirements, protect the rights, property, or safety of Hydro.Online, its business partners, you, or others.

### **Transfer, processing and storage of Personal Information**

We may transfer your Personal Information to any Hydro.Online affiliate entity worldwide or to third-party business partners, providers, vendors, or contractors, that are located inside or outside of the EU/EEA, for purposes described in the section "How we share your Personal Information" above, including for the purpose of data processing or storage on behalf and under the control of Hydro.Online.

Hydro.Online implements cross-borders transfers in compliance with applicable privacy and data protection regulations, including Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data ("**GDPR**"). Where mandated by applicable law, to ensure that your Personal Information does receive an adequate level of protection, Hydro.Online implements the appropriate measures to ensure that your Personal Information is treated across Hydro.Online affiliated entities and by the aforementioned third parties in a way that is consistent with and which respects the applicable privacy and data protection laws. For example, we include the European Union Model Clause in our agreements with our Partners.

### **Links to third-parties' websites**

The Services may contain links to third-party websites that are operated by companies outside of our control. Your activities on those third-party websites will be solely governed by the privacy policies and procedures of those third parties.

Hydro.Online takes no responsibility whatsoever for the content or information practices of such third parties and encourages you to review the privacy policies of these third parties before disclosing any information on their websites.



### **Integrating Social Networking Services**

One of the special features of the Service is that it allows you to enable or log in to the Services via various social networking services like Facebook or Google (together, “**Social Networking Services**”). By directly integrating the Social Networking Services, we make your online experiences richer and more personalized. To take advantage of this feature, we will ask you to log into or grant us permission via the relevant Social Networking Service. When you add a Social Networking Services account to the Services or log into the Services using your Social Networking Services account, we will collect relevant information necessary to enable the Services to access that Social Networking Service and your Personal Information contained within that Social Networking Service. We will use, store and disclose the relevant Personal Information thereby indirectly collected in accordance with this Privacy Policy. However, please remember that the manner in which Social Networking Services use, store and disclose your Personal Information on their end remains governed by the policies of such Social Networking Service, and Hydro.Online shall have no liability or responsibility for the privacy practices or other actions of any Social Networking Services that may be enabled within the Services.

You may also have the option of posting your Services activities to Social Networking Services when you access content through the Services (for example, you may post to Facebook that you performed an activity on the Service); you acknowledge that if you choose to use this feature, your friends, followers and subscribers on any Social Networking Services you have enabled will be able to view such activity, in accordance with the settings of your Social Networking Services account.

### **Security and confidentiality of your Personal Information**

The security and confidentiality of your Personal Information is important to us. We implement appropriate physical, administrative, and technical measures and safeguards designed to protect your Personal Information from loss, theft, misuse, alteration, unlawful or unauthorized access, use, or disclosure.

Hydro.Online also relies on reasonable measures to safeguard Personal Information in our possession, including:

- Enforcement of group-wide policies and procedures on Personal Information use, security and confidentiality;
- Restricting access to Personal Information to only those employees and third-party service providers on a “need to know” basis and under strict confidentiality requirements;
- Use of technologies to safeguard data during transmission, such as SSL encryption for some of the Personal Information that you provide via the Services and using appropriate security measures to safeguard the Personal Information we collect and possess;
- Use of industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our computer systems and networks.



The Internet and any communication thereon cannot be guaranteed to be secure at all times, and we cannot ensure or warrant the security of any Personal Information you provide us through this technology. In this regard, we have procedures to deal with any suspected Personal Information security breach and will notify you and any regulator of a suspected breach in accordance with the relevant applicable laws.

### **Retention of Personal information**

We will retain your Personal Information for only as long as needed to fulfill the purposes for which it is collected. We will retain and use your Personal Information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets and enforce agreements to which Hydro.Online is a party.

### **Your Rights**

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to this Information, as well as to seek to update, delete or correct this Information. You can usually do this using the settings and tools provided in your Hydro.Online account. If you cannot use the settings and tools, contact Customer Support for additional access and assistance.

### **Children's Privacy**

Hydro.Online encourages parents and guardians to take an active role in their children's online activities. Hydro.Online does not sell or offer its products and services to children. As such, our Services are designed for adult user interaction. We do not intentionally collect Personal Information from children under the age of 16. If you are a parent or legal guardian of a minor under the age of 16 and believe that the minor has disclosed personal information to us, please contact us using the contact details provided in this Privacy Policy.

### **Choice and Opt-Out**

We may send you service communications relating to the Services we provide you via email (e.g. to inform you about changes to the product or service you requested from us, revisions of our terms and conditions or this Policy). As such service communications are necessary for the purposes of providing you with our Services or complying with legal obligations, you will not be able to opt-out from receiving them.

### **Updates to this Policy**

We reserve the right to update this Privacy Policy from time to time in order to reflect any changes to our products or services or to comply with changes in our legal and/or regulatory obligations. Where such changes to our Privacy Policy are substantial, we will post the revised version on the Services, with an updated revision date. We will also notify you by other means prior to the changes taking effect, such as by sending you an email notification. By continuing to use our Services thirty days after such revisions are in effect, you will be deemed to accept and agree to the revisions and to abide by them.



## Contact

If you have any question or would like to enquire about Hydro.Online's privacy practices, the use of your Personal Information, or about this Policy, please contact us at:

Hydro.Online

Attn: Privacy Officer

Address: Gather, Ltd of P.O. Box 418 Road Town, Tortola, VG 1110 British Virgin Islands

Email: [privacy@Hydro.Online](mailto:privacy@Hydro.Online)

If you are not satisfied with our answer or the way we process your Personal Information pursuant to this Privacy Policy, you may also have the right to lodge a complaint with a data protection authority or a Court of competent jurisdiction. If you reside within the European Union, a list of national data protection authorities can be found here:

[http://ec.europa.eu/justice/dataprotection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/dataprotection/bodies/authorities/index_en.htm).