

Hexagate Solution Privacy Policy

Last Revised: October 30, 2024

Hexagate Ltd., (“**Hexagate**” “**Company**,” “**we**,” “**our**” or “**us**”) respects the privacy of our users (“**User(s)**” or “**you**”) and is committed to protecting the personal information that you share with us in connection with your use of our Solution (as defined below).

This privacy policy (the “**Privacy Policy**”) is intended to describe our practices regarding the information we may collect from you when you use our proprietary web3 security and risk intelligence platform which allows our Users to protect on-chain assets and their end-users against financial losses against theft originating from various blockchain and web3 threats and risk factors by providing a suite of products to mitigate cyber and financial risk and threats covering, but not limited to, real-time monitoring, detection and prevention tool (collectively, the “**Solution**”)

Our Solution operates primarily by analyzing publicly available blockchain data and information provided by our business customers. As a blockchain analysis tool, our Solution necessarily processes public blockchain transactions and addresses, which may, in certain circumstances, be linked to identifiable individuals. Additionally Hexagate collects and processes information concerning Users’ use of the Solution as further detailed below.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use available at https://extension.hexagate.com/webapp_terms_of_use.pdf (the “**Terms of Use**”), which this Privacy Policy is incorporated thereto by reference.

1. Scope and Applicability

This Privacy Policy applies only in connection with your use of the Solution. (these Terms of Use and the Privacy Policy shall be regarded collectively herein as the “**Hexagate Solution Terms**”).

2. Your Acknowledgement (PLEASE READ CAREFULLY!)

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SOLUTION, OR BY PROVIDING INFORMATION OR GRANTING US ACCESS TO INFORMATION PERTAINING TO ANY OTHER PERSON. YOU ACKNOWLEDGE THE TERMS SET FORTH IN THIS PRIVACY POLICY, INCLUDING WITH RESPECT TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS AND/OR USE THE SOLUTION IN ANY MANNER WHATSOEVER.

To the extent that your use of or access to the Solution are made on behalf of another legal or natural person, such access and use must be conducted in strict compliance with the Terms of Use and at your sole responsibility. Further, to the extent you provide us with or request us to collect or otherwise process any other person’s Personal Information (as defined below), you hereby represent that you received the required consent, authority, permission and approval of such person to provide or collect Personal Information and to allow Hexagate to collect, store, and use such Personal Information in accordance with this Privacy Policy.

PLEASE NOTE: YOU ARE NOT OBLIGATED TO PROVIDE US WITH ANY PERSONAL INFORMATION. YOU HEREBY ACKNOWLEDGE AND AGREE THAT YOU ARE

PROVIDING US WITH SUCH PERSONAL INFORMATION VOLUNTARILY, FOR THE PURPOSES DESCRIBED UNDER THIS PRIVACY POLICY, AND THAT WE MAY USE, PROCESS AND RETAIN SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND SUBJECT TO ANY APPLICABLE LAWS AND REGULATIONS.

3. Which Information Do We Collect on our Users?

We may collect the following types of data and information from our Users:

- **Non-Personal Information:** means any information that is non-identifiable and anonymous information (“**Non-personal Information**”). Non-Personal Information is collected without particular reference to the identity of an applicable natural individual User from or about whom such information was collected and is available to us while such User is entering and/or using the Solution. Non-Personal Information which is being collected consists of technical, behavioral, and aggregated information, and Eco-System Users’ Data (as defined in the Terms of Use) which is related only to companies and organizations as confirmed to Hexagate by the Eco-System Users, which such data may contain, amongst others, the activity of the User on our Solution, type of operating system, User's ‘click-stream’ on the Solution and which links the User used, type of browser and keyboard features, browser history, User demographics, traffic patterns, etc.
- **Personal Information:** any information that identifies an individual, or may with reasonable effort, identify an individual, either alone or in combination with other information (“**Personal Information**”). Personal Information may be of private or sensitive nature of a User or identify an individual. Users may be asked to provide certain Personal Information, specifically, depending on the nature of your use of the Solution, we may collect without limitation, your internet protocol (IP) address, information about your intent, contemplated transaction, transaction types and risk levels, your trading models, any other personal data which may be available through the blockchain related to subjects you have requested us to monitor, email address, login password, role and to the extent that you provide us information when contacting us in connection with your use of the Solution, we may also receive any types of Personal Information provided under such communication.

4. How We Collect Personal Information of Our Users?

There are a few main methods that we use:

- **Personal Information you provide us voluntarily.** For example, we collect Personal Information that you actively input to the Solution or the contents of your correspondence with our support.
- **Personal Information that we collect automatically when you use or access the Solution.** This is information which we automatically receive upon you access or interaction with our Solution. This information may include:
 - IP address or other persistent user and/or mobile device token (as applicable), log-in events.
 - Usage logs and events related to Users’ use of the Solution
 - Users’ configuration of the Solution

We will not collect any Personal Information from you or related to you without your approval, which is obtained, inter alia, through your active acceptance of the Hexagate Solution Terms.

5. The Purposes and Legal Basis of the Collection, Processing and Use of Information

Legal Basis for Use

We collect, process, and use your Personal Information for the purposes described in this Privacy Policy, based at least on one of the following legal grounds:

- **Performing an Agreement with You:** We collect and process your Personal Information in order to provide you with the Solution, following your acceptance of this Privacy Policy and pursuant to the Solution Terms of Use; to maintain and improve our services to you; to develop new services and features for our Users; and to personalize the use of the Solution in order for you to get a better user experience.
- **Legitimate Interest:** We process your Personal Information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your Personal Information for things like detecting, preventing, or otherwise addressing fraud, abuse, security, usability, functionality or technical issues with our services, ensuring that we are able to commercialize our Solution and services, protecting against harm to the rights, property or safety of our properties, or our users, or the public as required or permitted by law; Enforcing legal claims, including investigation of potential violations of this Privacy Policy; in order to comply and/or fulfil our obligation under applicable laws, regulation, guidelines, industry standards and contractual requirements, legal process, subpoena or governmental request, as well as our Solution Terms of Use.
- **With Your Consent:** We ask for your consent to collect and process your Personal Information for specific purposes and you have the right to withdraw your consent at any time.

Purpose of Use

We may use the Personal Information that we collect about you for the following purposes:

- To provide, operate, and improve the Solution for our Users and to manage our business.
- To enable us to provide you with customer support services and to further develop, customize, and improve the service based on Users' common preferences, uses, attributes and anonymized or de-identified data.
- To create cumulative statistical data and other cumulative information and/or other conclusive information that is non-personal, to enable us to improve our Solution and provide Users with a better user experience with more relevant and accurate information, services, third-party services, features and functionalities, statistical and research purposes, etc.
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities.
- To comply with any applicable rule or regulation, to protect our legal interests and/or respond to or defend against (actual or potential) legal proceedings against us or our affiliates.

6. Sharing Information with Third Parties

Hexagate will not share or otherwise allow access to any Personal Information it collects, or that you provide through the Solution to any third party, except in the following cases:

- **Law enforcement, legal proceedings, and as authorized by law:** We may disclose Personal Information to satisfy any applicable law, regulation, legal process, subpoena, or governmental request.
- **Protecting Rights and Safety:** We may share Personal Information to enforce this Privacy Policy and/or the Terms of Use, including investigation of potential violations thereof; to detect, prevent, or otherwise address fraud, security or technical issues; to respond to claims that any content available on the Solution violates the rights of third-parties; to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; and to protect the rights, property, or personal safety of Hexagate, any of its Users, or the general public.

Our Affiliated Companies: We may share Personal Information internally with our family of companies for the purposes described in this Privacy Policy. In addition, when Hexagate or any of our affiliated companies is undergoing any change in control, including by means of merger, acquisition, or purchase of all or substantially all of its assets, we may share Personal Information with the parties involved in such event. If we believe that such change in control might materially affect your Personal Information then stored with us, we will notify you of this event and the choices you may have via e-mail and/or prominent notice on our Solution.

- **Our Business Partners:** We may share Personal Information with our business partners who have assured us that they implement all means necessary to ensure the protection of such Personal Information and that they have obtained your consent and approval for such sharing of Personal Information.
- **Third Party Services:** We partner with certain third party service providers to provide us with selected services that are used to facilitate and enhance the Solution and your use thereof (“**Service Providers**”). Such third-party Service Providers may have access to, or process on our behalf Personal Information which we collect, hold, use, analyze, process and/or manage. These Service Providers include hosting, database and server co-location services, product analytics services (e.g., Sentry), remote access services (e.g., Amazon Web Services), data and cyber security services, fraud detection and prevention services (e.g., Amazon Web Services), e-mail and text message distribution and monitoring services, authentication services (e.g., Auth0) invoicing service providers (e.g., Morning) payment processors, customer relations management and support (e.g., HubSpot), dApp connection services (e.g., Walletconnect), form management services (e.g. Typeform) and our business, legal and financial advisors. We remain responsible for any Personal Information processing done by Service Provider on our behalf, except for events outside of our and/or their reasonable control, and except with respect to Service Providers with which you are contractually engaged, either through a prior separate contractual engagement and/or through acceptance of their privacy policy and terms of use if such are referenced herein.

For avoidance of doubt, Hexagate may transfer and disclose to third parties or otherwise use Non-personal Information at its own discretion.

7. Storage, Transfer and Retention of Your Information

Information regarding the Users will be maintained, processed, and stored by us and our authorized affiliates and service providers in Virginia, USA and in Israel.

While the data protection laws in the above jurisdictions may be different than the laws of your residence or location, please know that we, our affiliates, and our service providers that store or process your Personal

Information on our behalf are each committed to keep it protected and secured, pursuant to this Privacy Policy and industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

Specifically, each of our Service Providers and Business Partners which store or process your Personal Information either: (i) assured us that they provide adequate safeguards to protect your rights to privacy including where applicable, by undertaking to comply with the EU Standard Contractual Clauses; (ii) where applicable, hold and process such information on our behalf in a jurisdiction which has been determined to ensure an adequate level protection by the EU Commission; (iii) perform such processing pursuant to your consent and acceptance of their privacy policy.

By providing your information, you expressly consent to the place of storage and transfer, including transfers outside of the jurisdiction in which the information was provided.

We retain the Personal Information we collect only for as long as needed in order to provide you with use of our Solution in accordance with the terms of this Privacy Policy and to comply with applicable laws and regulations or otherwise as required for us to protect against claims by Users for the relevant statute of limitations period. We then either delete from our systems or anonymize it without further notice to you.

8. Updating, Obtaining A Copy of, Or Deleting of Personal Information

If for any reason you wish to exercise any rights to which you are entitled, under the law applicable to you, such as correction, deletion, access to and notification of the types of your Personal Information processed by us or on our behalf, you may do so by contacting Hexagate support at customers@hexagate.com. When handling these requests, we may ask for additional information to confirm your identity and your request.

Subject to limitations pursuant to applicable law and if entitled to the same thereunder, if you wish to exercise your right to access your Personal Information, you may be able to obtain the Personal Information you directly provided us (excluding data we obtained from other sources) in a structured, commonly used, and machine-readable format and may have the right to transmit such data to another party. We may provide such access through the Solution.

Please note, that upon request to delete your Personal Information, we will delete any such Personal Information pursuant to any applicable privacy laws or otherwise, we may de-identify any such Personal Information and thereby transform it to become Non-Personal Information. We may retain such data in whole or in part to comply with any applicable rule or regulation and/or to respond or defend against legal proceedings against us or our affiliates.

The rights available to you in connection with your Personal Information may also include the following:

- **Right of access.** You may have a right to know what information we hold about you and, in some cases, to have the information communicated to you. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information.
- **Right to correct Personal Information.** We endeavor to keep the information that we hold about you accurate and up to date. Should you realize that any of the information that we hold about you is incorrect, please let us know and we will correct it as soon as we can.
- **Data deletion.** In some circumstances, you have a right to request that some portions of the Personal Information that we hold about you be deleted or otherwise anonymized.

- **Data portability.** In some circumstances, you may have the right to request that data which you have provided to us is provided to you, so you can transfer this to another data controller.
- **Restriction of processing.** In some cases, you may have the right to request a restriction of the processing of your Personal Information, such as when you are disputing the accuracy of your information held by us.

To find out whether these rights apply to you and on any other privacy related matter, you can contact your local data protection authority if you have concerns regarding your rights under local law.

9. Minors

To accept the terms of this Privacy Policy, you must be over the age of eighteen (18) years old. Without relieving you of your responsibility to comply with the Solution Terms of Use and the terms hereof we reserve the right (without obligation) to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using our Solution.

In the event that we learn that a person under the age of eighteen (18) is using our Solution, not in accordance with the above-mentioned terms, we will use our best efforts to prohibit and block such User from accessing our Solution and will use our best efforts to promptly delete any Personal Information.

10. Security

We have implemented appropriate technical, organizational and security measures, designed to reduce the risk of accidental destruction or loss, or unauthorized disclosure or access to the Solution. Hexagate, however, does not and cannot guarantee that unauthorized access will never occur. We urge you to make sure to take appropriate measures to protect your browsing device and employ reasonable physical security means to protect unauthorized access.

Our Users Personal Information, or parts thereof, are hosted on Amazon Web Services at Virginia, USA which provides advanced security features. However, please note that we cannot guarantee that the Personal Information you provide to us when accessing and/or using the Solution, will not be exposed as a result of unauthorized penetration to the servers. Nevertheless, we employ industry standard procedures and policies to ensure the safety of its Users' Personal Information and prevent unauthorized use of any such information.

11. Changes to the Privacy Policy

Hexagate reserves the right to change this Privacy Policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this Privacy Policy on the Solution and/or if provided by you, we may choose to send you an e-mail regarding such substantial changes. Such substantial changes will take effect seven (7) days after such notice was provided on any of the above-mentioned methods. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date above, and your continued use of the Solution after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

12. General Information

This Privacy Policy and the relationship between you and Hexagate shall be governed by and construed in accordance with the laws of the State of Israel, without regard to its conflict of laws principles. You agree

to submit to the personal and exclusive jurisdiction of the courts located in Tel Aviv and waive any jurisdictional, venue or inconvenient forum objections to such courts, provided that Hexagate may seek injunctive relief in any court of competent jurisdiction.

This Privacy Policy was written in English and may be translated in the future into other languages. If a translated (non-English) version of this Privacy Policy conflicts in any way with the English version, the provisions of the English version shall prevail.

13. Have any Questions?

If you have any questions or comments concerning this Privacy Policy, you are welcome to send us an email at customers@hexagate.com and we will make an effort to reply within a reasonable time frame.

By contacting us, you represent that you are free to do so and that you will not knowingly provide Hexagate with information that infringes upon any third-party rights, including any privacy right. You further acknowledge that notwithstanding anything herein to the contrary, Hexagate may use or refrain from using any such information at its sole discretion.