

1inch Privacy Policy

Last updated: December 15, 2020

This Privacy Policy of 1inch Limited provides our privacy policy regarding the nature, purpose, use, and sharing of personal data or other information collected from the users of the website <https://1inch.exchange> and other websites which use subdomains of <https://1inch.exchange> (the "Site"), and any other applications or web services (the "App") owned or operated by 1inch Limited with regard to the Site and applicable functionality. This Privacy Policy also includes the Cookie. We are committed to protecting and respecting your privacy. Please read this carefully as this Privacy Policy is legally binding when you use the Site and/or App.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. IF YOU ARE UNWILLING TO AGREE TO THIS PRIVACY POLICY, OR YOU DO NOT HAVE THE RIGHT, POWER AND AUTHORITY TO ACT ON BEHALF OF AND BIND THE BUSINESS, ORGANIZATION, OR OTHER ENTITY YOU REPRESENT, DO NOT ACCESS OR OTHERWISE USE THE SITE AND/OR APP.

Changes to this Agreement

We reserve the exclusive right to make changes to this Privacy Policy from time to time, in our sole discretion. Your continued access to and use of the Site and/or App constitutes your agreement to be bound by specific terms of this Privacy Policy posted at such time. You acknowledge and agree that you accept this Privacy Policy (and any amendments hereto) each time you access the Site and/or App in any manner. Therefore, we encourage you to review this Privacy Policy regularly as you shall be bound by it.

If, within thirty (30) days of us posting changes or amendments to this Privacy Policy, you decide that you do not agree to the updated terms of the Privacy Policy, you may provide us with written notice of your withdrawal from this Privacy Policy to the email address at info@1inch.exchange. Upon providing us with the written notice of the withdrawal of your acceptance to this Privacy Policy, you shall no longer be authorized to access or use the Site and/or App, and you must immediately cease in doing so.

Eligibility

Age. By accessing our using the Site and/or App, 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 Site and/or App.

Legality. You are solely responsible for ensuring that this Privacy Policy is in compliance with all laws, rules, and regulations applicable to you and in your jurisdiction. If your use of the Site and/or App, or any functionality provided or activity enabled thereby, is prohibited or conflicts with any applicable law, rule or regulation, you may not, under any circumstances or for any reason, use the Site and/or App.

Criteria. We may, in our sole discretion, refuse to offer the Site and/or App to any person or entity and change the eligibility criteria for use thereof at any time.

Applicability

This Privacy Policy applies to all of your interactions with us via the Site and/or App, and your interactions with us in connection therewith.

Data processing in connection with the Site and/or App

Types of Information We Collect

To the maximum extent possible, we try to collect as minimum as possible Personal Information from you. Personal Information we collect:

- Email address, your name and any other your Personal Information you provide to Us when communicate with us. Such Personal Information is used only for communication with you;
- IP address, MAC address, cookie identifiers, domain server, data related to usage, performance, site security, traffic patterns, location information, browser and device information only when you are using our services at our Site and/or App;

We may also receive information about you from other sources, including through third-party services and organizations. For example, if you access third-party services, through the Site and/or App, we may collect information from these third-party services.

How and Why we use your Personal Information

We may use your Personal Information 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 services we provide through our Site and/or App;
- Analyzing the services we provide through our Site and/or App, including via: Google Analytics (please refer to [Google's Analytics` Policy](#) for more information).

To clear any doubts, we may use Personal Information described above or any other Personal Information only at your request and consent for particularly-tailored purposes you may require from us.

What kind of information is not collected in any case

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

Use of Cookies and Similar Technologies

As mentioned above, the Site and/or App is using cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are typically stored on your computer's hard drive. Information collected from

cookies is used by us to evaluate the effectiveness of our Site and/or App and analyze trends. The information collected from cookies allows us to determine such things as which parts of the Site and/or App are most visited and difficulties our visitors may experience in accessing the Site. With this knowledge, we can improve the quality of your experience on the Site and/or App by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties.

We use third party service providers, to assist us in better understanding the use of our Site and/or App. Our service providers will place cookies on the hard drive of your computer (or use similar technologies) and will receive information that we select that will educate us on such things as how visitors navigate around our Site and/or App. This information is aggregated to provide statistical data about our users' browsing actions and patterns, and does not personally identify individuals (however, see below information on Ethereum wallet addresses). This information may also include:

- Computer or mobile device information,
- Website usage information, such as:
 - Page views,
 - Account changes (i.e. connecting a wallet)
 - Button clicks,
 - Input form changes (without the values being tracked),
 - Errors.

Our service providers analyse this information and provide us with aggregate reports. The information and analysis provided by our service providers will be used to assist us in better understanding our visitors' interests in our Site and/or App and how to better serve those interests, as well as help ensure secure use of the website for all users. If you want to avoid using cookies altogether, you can disable cookies in your browser. However, disabling cookies might make it impossible for you to use certain features of the Site and/or App. Your use of the Site and/or App with a browser that is configured to accept cookies constitutes acceptance of our and third-party cookies.

Public Ethereum Addresses

We use public Ethereum 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 that it is necessary to fulfil a contract with you, as well as our legitimate interests, such as monitoring and improving the Site and/or App and the proper protection of the Site and/or App against risks.

Blockchain Data

Note that we are not responsible for your use of the Ethereum blockchain and your data processed in this decentralized and permissionless network.

Disclosure of Data

We may disclose any information about you:

- to the extent required by law or if we have a good-faith belief that such disclosure is necessary 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;

- in connection with a merger, division, restructuring, or other association change; or
- to our subsidiaries or affiliates only if necessary for operational purposes.

If we must disclose any of your Personal Information 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 Information will maintain the privacy or security of your Personal Information.

App Data storage details

While your usage of App, we store your Personal Data described herein locally on your device OR in encrypted form in Apple iCloud if it was enabled by you. Your Personal Data is stored in your private database, which is encrypted with an account-based key and additionally encrypted with a user-provided passphrase. Therefore, we do not have access to any data stored in your Apple iCloud account. We also do not have access to your Apple ID. We may optionally use Apple CloudKit to sync data between your Apple devices (iPhone, iPad, Apple Watch or other Apple devices).

Please also note that with regard to the App, you can revoke access to Apple iCloud and delete all your data in the iOS Settings app on your iOS device. For more information visit [Apple's privacy policy](#).

Data Retention Period

We may maintain a Data Retention Policy that may detail the retention period for Personal Information based on our analysis of how long the specific data are reasonably required for legal or business purposes. When we no longer need Personal Information, we securely delete or destroy it. Aggregated data, which cannot identify a device/browser (or individual) and are used for purposes of reporting and analysis, are maintained for as long as commercially necessary.

Sometimes business and legal requirements oblige us to retain certain information, 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 record-keeping.
- Complying with legal or regulatory requirements.
- Ensuring the continuity of our services at our Site and/or App.

Your Inquiries

You may contact us by email to the following email address: info@1inch.exchange or by post at Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands. We use the data that you provide in an email to us, which you may give voluntarily, only in order to answer your contact question or to reply to your email in the best possible manner.

Your rights under GDPR

Under certain circumstances, you may have a number of privacy rights concerning the use, storage, and processing of your Personal Information (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 Information. You can ask us for information regarding any data of yours 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 whom we have sent your data.
- **right of access** – You may ask us whether we process your Personal Information and you have the right to request a copy of the information 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 information that we hold about you to be erased from our system and we will comply with this request unless we will have a legitimate reason not to do so.
- **right to restriction of processing** – where certain conditions apply, you can ask us to ‘block’ the processing of your 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 Information in a structured, commonly used format. Please apply at info@1inch.exchange to find out whether we currently support the provision of the portable file containing Personal Information we process about you.
- **right to object** - You can object to the processing of your data at any time for reasons that arise from your special situation provided the data processing is based on your consent or our legitimate interest or that of a third party. In this case, we will no longer process your 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 against legal claims.
- **right to withdraw consent** - withdraw the consent you gave us with regard to the processing of your Personal Information 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.

In addition to the above, we reference certain rights for the European Territory citizens throughout this Privacy Policy. Pursuant to the GDPR, citizens from the "**European Territories**" mean the European Economic Area (EEA) and Switzerland. For the purpose of this Privacy Policy, the term "European Territories" shall continue to include the United Kingdom, even after the United Kingdom leaves the European Economic Area following Brexit.

Please email at info@1inch.exchange 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.

Your rights under the Privacy Laws of California

FOLLOWING OUR [TERMS OF SERVICE](#), THE RESIDENTS OF THE USA AND CALIFORNIA PARTICULARLY (AND OF OTHER COUNTRIES), ARE PROHIBITED TO USE OUR SERVICES, INCLUDING FROM OUR SITE AND/OR APP.

PLEASE ALSO NOTE THAT IN CASE OF POSSESSING INFORMATION REGARDING YOUR AVOIDANCE OF THE DESCRIBED ABOVE BAN, WE RESERVE THE RIGHT TO DISCONTINUE TO PROVIDE OUR SERVICES TO YOU, INCLUDING THROUGH THE SITE AND/OR APP.

In any case, to avoid any violations on our part, if you are using our services through our Site and/or App by avoiding the ban described in the paragraph above and if you are a resident of the State of California, you may have certain rights with respect to your data in accordance with the California Consumer Privacy Act (CCPA) and the California Civil Code as amended by the CCPA.

Your rights as a resident of California:

- **right to access** - you may request that we disclose the categories of personal information collected, the categories of sources from which personal information is collected, the business or commercial purpose, the categories of third parties with which the business shares personal information and specific pieces of information that have been shared or sold.
- **right to opt-out** - you are entitled to tell us not to sell personal information about you to third parties.
- **right to deletion** - the right to have your data deleted.

We do not “sell” your Personal Information, we do not allow anyone to “sell” your Personal Information and we don't know about any “sale” of your Personal Information, regardless of your age.

Keep in mind, under the California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice describing what categories of personal information we share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request by email at info@1inch.exchange. Please allow 30 days or more for a response.

Privacy of children

Our Site and/or App is not directed to collect any data from people under the age of 18. We do not knowingly allow anyone under 18 to submit any data to our Site and/or App. If you believe

your child may have provided us with their data, you can contact us using the information in the Contact section of this Policy and we will delete the data from our Site and/or App.

Do Not Track (DNT) signals disclosure

Some web browsers may transmit “do-not-track” (DNT) signals to the websites. We do not currently take action in response to those signals. If an industry standard on responding to such signals is established and accepted, we may reassess how to respond to those signals.

International transfers

We are entitled to transfer your personal or non-personal data to third parties abroad for the purposes of the data processing. As personal data processors, they are obliged to protect data privacy to the same extent as we ourselves. We choose the processors carefully to ensure compliance with applicable laws.

Data Integrity & Security

We take information security very seriously. We work hard to protect the Personal Information 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 Information submitted to us, both during transmission and once it is at rest.

Please note that no electronic transmission, storage, or processing of Personal Information can be entirely secure. We cannot guarantee that the security measures we have in place to safeguard Personal Information 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 Information will always remain private or secure.

Contact

Please contact us with questions, comments, or concerns regarding our Privacy Policy as well as with any requests at info@1inch.exchange.

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.