

Privacy Policy

Grey HAT ICO provides access to the ICO platform under “Grey HAT ICO” (website <https://ico.grey-hat.io/> and Grey HAT Android App, Grey HAT iPhone App).

Know about Grey HAT ICO privacy policy.

In case of any legal inquiries please contact us via legal@grey-hat.io.

Persons availing of the Grey HAT ICO Services, directly or indirectly, are referred to herein, as “Users”.

This is an agreement between Grey HAT ICO and the User, which is binding and requires mandatory compliance by the User. Integrity, honesty, and ethical business practices are some of the core values of Grey HAT ICO. Moreover, Grey HAT ICO strongly condemns any and all activities related to money laundering and other illegal actions. In order to prevent misuse of the Grey HAT ICO privacy policy services, Users are required to strictly comply with the terms contained herein. It forms part and parcel of the User Terms of Service. Terms not defined herein shall carry the same interpretation as in the User Agreement and in the absence thereof to general usage and parlance.

Users must read, review, understand, and then agree to the terms hereunder for using or availing of the Grey HAT ICO Services. Before clicking the “I Accept” option.

This Agreement supersedes and replaces any and all prior oral or written understandings or agreements between Grey HAT ICO and the User with respect to the Privacy Policy.

DEFINITIONS

All terms defined in the Terms of Service and the Anti-Money Laundering Policy will carry the same meaning, force, and effect in this Privacy Policy.

“*Applicable Law*” means the law in force for the time being within the territory of the United States of America;

Grey HAT ICO PRIVACY POLICY

(A) Grey HAT ICO is committed to ensuring the safety and protection of all data and information shared with Grey HAT ICO by its Users subject to Applicable Laws and the terms and conditions set out hereunder. Moreover, processes established by Grey HAT ICO are in compliance with the applicable reasonable security practices and procedures. Thereafter, prescribed by Government or Regulatory authorities, as the case may be.

(B) Grey HAT ICO shall not be liable for any breach or violation of its systems or Grey HAT ICO privacy policies due to malicious attacks, errors, commissions, or omissions not willfully initiated by Grey HAT ICO. Thereafter, leading to a breach of data or information of the User.

DATA COLLECTED

(A) Grey HAT ICO collects all personal data and information of the User including sensitive personal information. Use of the Grey HAT ICO services is contingent on acceptance of the

terms contained herein. User shall be deemed to have volunteered the data and information collected, retained, used, and disseminated by Grey HAT ICO. Thereafter, upon accepting the terms herein and those contained in the Terms of Service of Grey HAT ICO.

(B) User hereby consents that when personal data is shared with Grey HAT ICO, User hereby agrees and acknowledges Grey HAT ICO's right to use or disseminate such data or information including transfer of the personal and sensitive personal information of the User from current location to external sources including outside US and third parties.

(C) Grey HAT ICO collects and retains data and information of users including the following:

Grey HAT ICO Collects and Retains Data & Information of Users

i. Information provided/shared by the User:

Grey HAT ICO collects any and all personal information provided by the User to Grey HAT ICO. This information may include that which is provided by the Users, at the time of opening an account and transacting with Grey HAT ICO including the following:

- a. Name,
- b. Residential Address,
- c. Registered Mobile Number,
- d. Email Address,
- e. Government-issued ID,
- f. Bank Account Details
- g. Any other information.

ii. Grey HAT ICO may collect, retain, use, or store data or information automatically collected from a device or through connections associated with such device, including but not limited to the following:

- a. User's device information including but not limited to IMEI or equipment identification number, IMSI or subscriber identification, MAC address, Android version, device details, network operator, contact list information, Wifi / Data Network connectivity.
- b. Information generated by the User's use of the app and the website, including cookies and IP addresses.
- c. Access to User's Photo Gallery / Media / Files / Camera;
- d. Access to User's other apps and services including messaging through SMS; usage data;
- e. Geolocation of a User's device or such or other automatically collated data or information of User.

PURPOSE & USE OF DATA COLLECTED

(A) Grey HAT ICO collects, retains, and puts to use the information shared by the User, as above, with the consent of and concurrence of the User. The data and information collected above are utilized by Grey HAT ICO, to ensure the effective rendering of its Grey HAT ICO Services and to comply with legal requirements.

(B) Grey HAT ICO does not sell the data collected and retained by the User.

(C) Data collected from the User is put to use by Grey HAT ICO to enhance its services to the User.

COLLECTION OF DATA: GREY HAT ICO PRIVACY POLICY

(A) *Cookies*

- i. Grey HAT ICO uses cookies on its App and website to collect data about Users. Cookies collect User information including App usage, visits to the App or website, and other User-generated information. Cookies allow Users to navigate from page to page without having to re-login each time, count visits, and see which areas. It features of the Grey HAT ICO App and website are popular.
- ii. Grey HAT ICO may also use the data collected via cookies to tailor advertisements to Users and to track the popularity of its website. Use of cookies and other technologies may allow Grey HAT ICO and third parties to collect information about User browsing activities over time and across different websites following use of Grey HAT ICO services.
- iii. Grey HAT ICO also collects information that your browser sends whenever User visits its site. This information may include information such as the device's Internet Protocol ("IP") address (with replaced last byte), browser type, browser version, the pages of Grey HAT ICO site that User visits, the time and date of visit, the time spent on those pages and other statistics.

(B) *Analytics*

- i. Grey HAT ICO uses third party analytical tools to collect data about User devices and Internet connections. That information includes the IP address of User computer and/or Internet service provider, when User accesses its website, the Internet address of websites from which User links to the Grey HAT ICO website, specifications of User browser, and User movements and preferences on the Grey HAT ICO website. All of this information is used internally for the purpose of understanding how the Grey HAT ICO website is being used and to improve the same.
- ii. Grey HAT ICO also uses third-party analytical tools to collect data about the usage of the Grey HAT ICO mobile app. The information collected identifies the types and timing of actions taken, including installation, registration, uploading, and certain types of navigation. All of this information is for the internal purposes of understanding. How the Grey HAT ICO mobile app is in used to improve the same.

(C) *Action Tags*

- i. Grey HAT ICO uses action tags to identify pages visited and interacted with by the User. Action tags may collect and transmit this data in a manner that identifies the User. If the User registers with the Grey HAT ICO website. It is in the Grey HAT ICO website. Grey HAT ICO also uses action tags in emails. Thereafter, to determine whether an email has been opened or whether it has been forwarded to a third party.
- ii. Grey HAT ICO also uses action tags in the mobile app which may identify the websites visited by the User. Moreover, the manner in which the User interacts with them.

(D) *Do Not Track*

Grey HAT ICO currently does not respond to "Do Not Track" signals. It operates in this Privacy Policy whether or not a Do Not Track signal is received. Moreover, if there is a change in such policy, a suitable modification to this Privacy Policy by Grey HAT ICO listing out the mechanism and procedure for the same.

GRIEVANCE

User may register their grievance with respect to data collection, retention or use to Grey HAT ICO's Grievance Officer via contact form in <https://ico.grey-hat.io/>

DATA RETENTION

(A) Grey HAT ICO shall retain the User's information for as long as the account is active or as needed to provide services in accordance with applicable laws.

(B) The retention period may be extended to comply with legal obligations, resolve disputes, and enforce agreements for a period of ten years after termination of the account or such extended period, under applicable laws. Grey HAT ICO may retain data for such or further periods. However, there is no obligation to do so in all instances. Grey HAT ICO shall not be liable or responsible for the non-availability of information beyond the termination of the User account.

(C) The retention period may extend beyond the end of User account, but it will be only as long as it is necessary for Grey HAT ICO to have sufficient information to respond to any issues that may arise later, including but not limited to retention for the purpose of investigations or ongoing prosecutions or in case of Suspicious transactions or if Grey HAT ICO requires the information for its records or to support legal proceedings, or if Grey HAT ICO believes in good faith that a law, regulation, rule or guideline requires it.

SHARING OF INFORMATION WITH THIRD PARTIES

The User agrees and consents to Grey HAT ICO sharing the following anonymized data. Otherwise, give Grey HAT ICO permission to share with third parties the following:

(A) For advertising, referral, operations, financial services, and technology services (such as hosting providers, identity verification, support, payment, and email service providers);

(B) If required by applicable law or legal process, or if Grey HAT ICO believes that it is in accordance with applicable law or legal process;

(C) To protect the rights, property and safety of Grey HAT ICO, its users and the public, including, including but not limited to usage in court proceedings, or to detect or prevent criminal activity, fraud, material misrepresentation, or to establish its rights or defend against legal claims; or

(D) In connection with selling, merging, transferring, or reorganizing all or parts of Grey HAT ICO's business.

Grey HAT ICO Privacy Policy: REASONABLE SECURITY PRACTICES

(A) Protection of the User's personal information is of utmost importance to Grey HAT ICO and it takes all reasonable steps to secure data and information pertaining to its Users, including those prescribed under all applicable laws

(B) Grey HAT ICO takes appropriate legal, administrative, physical, and electronic measures designed to protect the information. Moreover, users share with Grey HAT ICO from accidental or unlawful destruction, accidental loss or unauthorized access, use, modification, interference, or disclosure.

(C) Grey HAT ICO however does not extend any warranties with respect to the security or safety of data and information transmitted through digital platforms or online, both of which are susceptible to malicious attacks.

MODIFICATIONS

Admin conducts periodic reviews and revisions. Users will be notified through an update of the App. Thereafter, the new draft is available on the Grey HAT ICO Website and will reflect the

modified date of the terms. Users must periodically visit the website and review terms and any changes thereto. Continued use of the Grey HAT ICO Services constitutes the agreement of the user to the terms contained herein and any amendments thereto.

MISCELLANEOUS

All other provisions of the Grey HAT ICO privacy policy begin into this policy and shall form part hereof. This includes Governing Laws and jurisdiction, notices, severability, assignment, and such or other provisions.