

# HASH CIB PRIVACY POLICY

This policy explains what, when and why and the methods by which we may collect personal information about you and how we use the information. This notice is intended to inform you why and how we collect, use and store your personal data, the lawful basis on which your personal data is processed; and your rights and our obligations in relation to the processing of your personal data. Please read this policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data. If you do not agree with this Privacy Policy in general or any part of it, you should not use our services.

## 1. Definitions:

**“Consent”** means a statement given by the data subject containing a clear affirmation signifying agreement to the processing of personal data relating to him or her which has been freely given.

**“Controller”** means the legal entity which alone or jointly determines the purposes and means of processing personal data

**“HASH CIB”**, **“we”** or **“HASH CIB Research”** means ICO B@nk, LLC and its affiliated persons.

**“Personal Data”** means any information that relates to an identified or identifiable natural person (rather than a legal entity such as a company)

**“Processing”** means any operation or set of operations which is performed on personal data including but not limited to as collecting, recording, organising, structuring, storing, adapting or altering, using or disclosing;

**“Processor”** means any natural or legal person which processes personal data on behalf of the Controller

**“Sensitive Personal Data”** means information which is particular sensitive such as racial or ethnic origin; political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex like or sexual orientation.

## 2. Who we are.

HASH CIB is an LLC, formed under laws of the Russian Federation. Its primary purpose is to provide cryptoasset research, (non-investment) advisory services and associated services to the professional investment community to the extent it complies with the laws and regulations governing each member of professional investment community wishing to employ HASH CIB to provide such services . For the purpose of this policy, ICO B@nk, LLC, a company incorporated in the Russian Federation whose registered office is at Shlyuzovaya embarkment, bld. 4, Floor 5, Placement I, Office 8, Moscow 115114, and whose registered number is OGRN 5177746264482 (“HASH CIB”, “HASH CIB Research”, “we”, “us”, and “our”) will be the Controller.

## 3. Information we collect:

We obtain Personal Data from you directly. We also obtain information from publicly available sources and from service providers we have engaged to carry out specific Processing activities such as searches against government sanctions lists.

We collect the following types of information:

- Identity information, including personal details such as name, company details and electronic address (such as email address);
- Contact information, including your email address;
- Log-in information, including access to;
- Information related to your job position, such as your job title, your remit, and the company you work for;
- Details of our interactions with you, including written/electronic communication, records of use of our email distributions and website (such as opening emails, pages accessed and downloading product), records of any agreements, transactions which contain your name and any identifiers that we or our affiliates hold;
- Web server log information, including IP address and browser fingerprint.

**4. What we will do with your information.** We use your information in the following ways:

**A) Subscribe to HASH CIB Research mailing list**

To subscribe you to our mailing list, we require you to provide us with identity information, contact information, and information related to your employer.

**B) Enabling Access to our HASH CIB Research**

In order to access Research, you will need access to our website (<https://hashcib.com/#research>), and to allow you access we will Process your identity information, log-in information and pages/documents accessed. We Process such Personal Data to grant access to our research papers.

**C) Email and Telecommunications**

We will communicate with you via a number of methods including email, telecommunication and via social media. When doing so, we Process your identity information and contact information, as well as details of our interactions with you. Such Processing includes storing. We Process such Personal Data (1) to assess your eligibility to get access to our materials.

**D) Regulatory and legal purposes:**

HASH CIB is not licensed to carry out any banking or broker services or similar activities in the Russian Federation or anywhere in the world, is not a regulated entity in any jurisdiction, and does not hold any licenses or other permits from any regulatory bodies of any jurisdiction. However, we acknowledge that HASH CIB may be subject to routine and ad hoc examinations [by regulators] where your Personal Data may be part of that examination. The Personal Data you provide on getting access to HASH CIB Research may become subject to review as part of that examination.

**E) Information Security:**

When you access our website [www.hashcib.com](http://www.hashcib.com), our third party hosting provider stores web server logs to ensure Information security. This includes analyzing log files to help to identify and prevent unauthorized access to our website. We Process such Personal Data because we have a legitimate interest in using your information for the purpose of ensuring information security.

**5. Sharing your Personal Data**

HASH CIB uses a number of service providers in the course of providing services. These service providers will act as Processors and will only Process your Personal Data on our instructions. These service providers include:

- cloud storage providers located in the EU and United States to store the personal data you provide and for disaster recovery service, as well as for the performance of any contract we enter into with your employer;
- IT Services providers that provide us with SaaS services, including Google Firebase, Google Cloud Service, Google Analytics, who we use to store our subscriber information management, to distribute Research products, etc.;

We will share your information with law enforcement agencies, public authorities or other organizations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- comply with a legal obligation, process or request;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

## **6. Third Country sharing of Personal Data**

The information that we collect from you will be stored and processed in the Russian Federation. When sharing your Personal Data with our affiliates, we will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy.

## **7. Direct Marketing and Your Right to Object**

Under existing law, you have the right to object against our use of your Personal Data for direct marketing purposes. You can opt out of receiving any marketing emails by unsubscribing through the relevant communication or by contacting us at [research@hashcib.com](mailto:research@hashcib.com).

## **8. Cookies**

We do not use cookies to collect information about your browsing activities over time and across different websites following your use of our services. Third party Internet service providers, such as Google Analytics, could use cookies in relation to your browsing activity including browsing through our website. You can find more information about cookies and how to manage them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **9. Your rights to access personal data**

Under the applicable data protection laws, you have a number of rights with regard to your personal data. You have the right to request from us information as to how we Process your Personal Data. You have the right to restrict the Processing of Personal Data when the accuracy of the Personal Data is contested but whilst allowing us a reasonable period to rectify that inaccuracy. You also have the right to restrict the Processing of your Personal Data where you believe this to be unlawful or where you believe we no longer need to Process your Personal Data. You have the right to have Personal Data erased in certain circumstances such as where you have withdrawn consent to process Personal Data. Furthermore you have the right to object to certain Processing where we are relying on the legal basis of having a legitimate interest. However, in the event that Autonomous has compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or where Autonomous need to process the Personal Data for the establishments, exercise or defence of legal claims,

we may agree to cease Processing the Personal Data whilst retaining the data for use with the stated purpose. Where we rely on your consent to Process data you have the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent.

Subject to the applicable law (and any relevant exceptions under the law), you may have the right to access, update, change or delete personal data. You can exercise your rights by contacting us by sending an email to [research@hashcib.com](mailto:research@hashcib.com). We will endeavour to respond to your request without delay but in any event within one month of receiving your request. Requests to delete information we may hold is subject to applicable laws and regulation and it may not therefore be possible to wholly delete the information. We aim to notify you in the event we are unable to meet requests for deletion in whole or in part. In order to process your request in a timely manner we ask that any such request is made with a valid means of identification being attached in order to comply with our security obligations and prevent unauthorised disclosure of data.

## **10. Complaints**

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [research@hashcib.com](mailto:research@hashcib.com) and we will endeavour to deal with your request. This is without prejudice to your right to launch a claim with the Information Commissioner's Office or the data protection supervisory authority in the country in which you live or work where you think we have infringed data protection laws.

## **11. Changes**

Any changes we will make to this policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy.

## **12. Information Security**

We maintain procedures and technology to prevent others from accessing your Information.

HASH CIB will have access to your non-public personal information only to the extent that you have explicitly permitted us by providing it yourself. HASH CIB agrees to hold such information in confidence and to comply with this privacy policy.