

1inch Network Privacy Policy

Last updated: June 3, 2021

1inch Network, accessible from <https://1inch.io>, one of community's main priorities is the privacy of participants, which are visitors to <https://1inch.io> and all its dApps (the "Interface").

1inch Network does its best to collect as minimum personal data as possible. Still, it's quite a task not to collect it at all as there is a constant interaction within the community. That is why this Privacy Policy document contains types of data that is collected and recorded by 1inch Network and how it is used.

If you have additional questions or require more information about this Privacy Policy, do not hesitate to contact info@1inch.io.

This Privacy Policy applies only to our online activities and is valid for participants which are visitors to our website with regards to the data that they shared and/or collect in 1inch Network. This policy is not applicable to any data collected offline or via channels other than this website. Please read this Privacy Policy carefully to understand our policies and practices regarding your data and how it will be treated by the Interface.

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 INTERFACE.

1. 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 Interface 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 Interface 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.io. 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 Interface, and you must immediately cease in doing so.

2. Eligibility

Age. By accessing our using the Interface, 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 Interface.

3. Applicability

This Privacy Policy applies to all of your interactions with us via the Interface, and your interactions with us in connection therewith.

4. Data processing in connection with the Interface

Types of Data 1inch Network Collect

To the maximum extent possible, 1inch Network try to collect as minimum as possible Personal Data from you. Personal Data we collect:

- Email address, your name and any other your Personal Data you provide to us when communicating with us. Such Personal Data is used only for communication with you;
- The Personal Data that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Data;
- IP address, MAC address, log files, domain server, data related to usage, performance, website security, traffic patterns, location information, browser and device information only when you are using Interface;
- Your name and address you provide to us when ordering our merch products.

Currently, 1inch Network do its best to promote itself. To do so, we constantly engage with various third-parties advertising platforms. Those third-parties advertising platforms are only effective when their technical features (so-called “pixels”) are enabled through Interface. The mentioned third-parties advertising platforms may collect anonymised Personal Data of Interface`s visitors only with the purpose to optimize their advertising possibilities through their platforms. In all those cases 1inch Network do not engage with the mentioned Personal Data of Interface`s visitors.

We may also receive data about you from other sources, including through third-party services and organizations. For example, if you access third-party services, through the Interface, we may collect data from these third-party services.

How and Why we use your Personal Data

We may use your Personal Data 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 Interface;
- Delivering our merch products to users that ordered them;
- Analyzing the services we provide through the Interface, including via: Google Analytics (please refer to [Google`s Analytics` Policy](#) for more information);
- Send you marketing, advertising, informational emails;
- Find and prevent fraud.

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

What kind of Personal Data 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 website that asks you to enter your private keys or wallet seed.

Log Files

1inch Network follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The data collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any data that is personally identifiable. The purpose of the data is for analyzing trends, administering the website, tracking users' movement on the website, and gathering demographic information.

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 Interface and the proper protection of the Interface 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.

Advertising Partners Privacy Policies

Third-party ad servers or ad networks use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on 1inch Network, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

Note, that 1inch Network have no access to or control over these cookies that are used by third-party advertisers.

Cookies

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

Disclosure of Data

We may disclose any Personal Data 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 (if any) only if necessary for operational purposes.

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

Data Retention Period

1inch Network maintain Personal Data exclusively within the time needed to follow prescribed herein legal or business purposes. When we no longer need Personal Data, 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. In any case, we are going to erase data on the user`s name and address after 30 calendar days pass from the date of order of 1inch Network merch products.

Sometimes business and legal requirements oblige us to retain certain data, 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 Interface.

Your Inquiries

You may contact us by email to the following email address: info@1inch.io; 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.

5. Your rights under GDPR

Under certain circumstances, you may have a number of privacy rights concerning the use, storage, and processing of your Personal Data (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 Data. You can ask us for data 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 Data and you have the right to request a copy of the data 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 data 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 Data in a structured, commonly used format. Please apply at info@1inch.io to find out whether we currently support the provision of the portable file containing Personal Data 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 Data 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.

Please email at info@1inch.io 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.

6. Privacy of children

Our Interface 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 Interface. If you believe your child may have provided us with their data, you can contact us using the information in this Policy and we will delete the data from our Interface.

7. 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.

8. Data Integrity & Security

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

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

9. 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.