



HeX 101 LTD
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HEX 101 LTD

PRIVACY POLICY

Your privacy is important to HeX 101 LTD, (“HeX 101 LTD”). This Policy explains how your personal information is collected, used, and disclosed by HeX 101 LTD.

This Privacy Policy (“**Privacy Policy**”) explains how information is collected, used and disclosed by HeX 101 LTD Inc., a company incorporated at Companies House, UK, (“**HeX 101 LTD**”, “**we**”, or “**us**”), and applies to information we collect when you use or access our online or mobile websites (www.hex101.co.uk), products, services or applications (collectively, the “**HeX 101 LTD Services**”), or when you otherwise interact with us. We respect the privacy rights of users and recognize the importance of protecting information collected about you.

HeX 101 LTD complies with EU’s General Data Protection Regulations (“GDPR”). See the sections entitled EU-U.S. Privacy Shield, Swiss-U.S. Privacy Shield, and International Transfer, below, for further information.

WHAT WE COLLECT

We collect information from you in various ways when you use our website or correspond with us via communication services, such as email and social media. We may collect personal information that you directly enter on our website or send to us via communication services. Information we may collect includes name, email address, title, and company. In addition, when you visit our website some information may be automatically collected. For example, it is standard for your web browser to automatically send information to every website you visit including ours. That information includes your computer's Internet Protocol (IP) address, access times, browser type and language, and referring website addresses. We may also collect information about your computer's operating system and information about your usage and activity on our website. We use this information, which does not identify individual users, to administer the site, to track users' movements around the site or hosted service, to improve our products and services, and for internal recordkeeping as a whole. To learn more about how we automatically collect personal information, see the section entitled Tracking Technologies.

HOW WE USE PERSONAL INFORMATION WE COLLECT

The personal information we collect allows us to provide you with our products and services, to operate and improve our website, and for other purposes described in this Policy or disclosed to you on our website or in connection with our products and services. For example, we may use the information we collect from you on our website:

- to register you for an account with us to use the Hosted Service (HeX 101 LTD Control) or HeX 101 LTD Client Application;
- to allow you to apply to become a partner or customer;
- to facilitate the provision of software updates and improve your experience on our Site;
- to respond to comments and questions and provide customer service; and
- to deliver service messages and other services and content you request and to send information related to accounts and services, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.

HeX 101 LTD may store and process personal information in the United States and other countries.

SHARING OF PERSONAL INFORMATION

We use third parties such as an email service provider to send out emails on our behalf. When you sign up for our products or services, we will share the personal information you provide only as necessary for the third party to provide that service. These third parties are obligated to protect your information. We do not sell your personal information to third parties. If this practice should change in the future we will update this policy and provide individuals with opt-out or opt-in choice as appropriate prior to sharing their personal data.

We do not share your personal information with third parties other than as described in this privacy policy above and as follows:

- with third party vendors, consultants and other service providers (“Service Providers”) who are working on our behalf and need access to your information to carry out their work for us;
- to (a) comply with laws or respond to lawful requests from public authorities including to meet national security and law enforcement requirements, and legal process, (b) to protect the rights and property of HeX 101 LTD, our agents and others including to enforce our agreements, policies and terms of use, or (c) in the good faith belief that disclosure is needed to respond to an emergency or protect the personal safety of any person;
- in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. In any such event, we will provide notice via email and a prominent notice on our website if your data is transferred and becomes subject to a different privacy policy; and
- to any other third party with your prior consent to do so.

EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

HeX 101 LTD complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, United Kingdom, and Switzerland to the United States.

HeX 101 LTD has certified to the Department of Commerce that we adhere to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

Our participation in the Privacy Shield applies to all personal data that is subject to this Privacy Policy and which is received from the EU and the European Union, European Economic Area, United Kingdom, and Switzerland. We will comply with the Privacy Shield Principles in respect of such personal data.

Our accountability for personal data that we receive under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks and subsequently transfer to a third party is described in the Privacy Shield Principles. In particular, we remain responsible and liable under the Privacy Shield Principles if third-party agents that we engage to process the personal data on our behalf do so in a manner inconsistent with the Principles, unless we prove that we are not responsible for the event giving rise to the damage. Pursuant to the Privacy Shield, HeX 101

LTD remains liable for the transfer of personal data to third parties acting as our agents unless we can prove we were not a party to the events giving rise to the damages.

We acknowledge that pursuant to the EU-U.S. and Swiss-US Privacy Shield Frameworks EU, UK and Swiss individuals have the right to access their data that is transferred into the United States. Data subjects can also update, amend or change inaccurate information and request deletion of data that is found to have been processed in violation of the Privacy Shield Principles. Individuals wishing to exercise this right may do so by emailing us at accounts@hex101.co.uk

We encourage all European individuals (including Swiss and United Kingdom individuals) to contact us should you have a GDPR or Privacy Shield-related (or general privacy-related) complaint at accounts@hex101.co.uk.

We have further committed to refer unresolved privacy complaints under the EU-U.S. Privacy Shield Principles or the Swiss-U.S. Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/bbb-eu-privacy-shield-consumers/ProcessForConsumers> for more information and to file a complaint. Please do not refer GDPR complaints to BBB Privacy Shield. If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 here: [link](#).

HeX 101 LTD is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

INTERNATIONAL TRANSFERS

As part of its GDPR compliance program, HeX 101 LTD now requires a data processing agreement with its data controllers containing the EU's Standard Contractual Clauses which covers the collection, use, retention and processing of personal information transferred from the European Union to the United States. Any questions regarding HeX 101 LTD's GDPR compliance should be submitted to accounts@hex101.co.uk.

EU, UK and Swiss individuals with GDPR complaints also have the right to contact their local data privacy authority (DPA) or the Swiss Federal Data Protection and Information Commissioner (FDPIC). Please follow the links below for more information regarding these options:

Swiss Individuals — <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection—switzerland.html>

EU Individuals — https://edpb.europa.eu/about-edpb/board/members_en

UK Individuals — <https://ico.org.uk/>

TRACKING TECHNOLOGIES

Tracking technologies such as: cookies, beacons, tags and scripts are used by HeX 101 LTD, our website analytics and service partners such as Google Analytics, HubSpot or Salesforce. These technologies are used in analysing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies for saving users' settings, improving navigation, and to provide more relevant information on our website. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

We gather certain information automatically and store it in log files. This information may include Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine these log files with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

We use Local Storage (LS) such as HTML5 to store content information to provide certain features on our website. Various browsers may offer their own management tools for removing HTML5 LS.

We partner with a third party to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests.

SECURITY OF YOUR PERSONAL INFORMATION

The security of your personal information is important to us and we are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place reasonable suitable administrative, technical, and physical measures and procedures to safeguard and secure your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. Please be aware, however, that despite our efforts, no security measures are impenetrable. If you have any questions about security on our website, you can contact us at accounts@hex101.co.uk

UPDATING AND ACCESSING YOUR PERSONAL INFORMATION

If your personal information changes, we invite you to correct or update your information as soon as possible. You can request changes or access to your information by emailing accounts@hex101.co.uk. If you wish to cancel your account, request that we no longer use your information to provide you services or delete your information, contact us at accounts@hex101.co.uk. We will respond to your request to have your personal information deleted within thirty (30) days.

DATA RETENTION

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us at accounts@hex101.co.uk. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

OPT-OUT

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or you can contact us at accounts@hex101.co.uk

CHILDREN

We do not knowingly collect personal information from children under the age of thirteen (13). If we learn that we have collected the personal information of a child under the age of 13, we will take steps to delete the information as soon as possible.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites, products and services of interest. In the event that our website includes links to other websites or sites whose privacy practices may differ from those of HeX 101 LTD, you should note that we do not have any control over that other website. Therefore, if you submit personal information to any of those sites, your information is governed by their privacy statements, and we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy statement. We encourage you to carefully read the privacy statement of any site you visit.

SOCIAL MEDIA WIDGETS

Our Site includes Social Media Features, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

PUBLIC FORUMS

Our website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at accounts@HeX 101.co.uk In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

FRAMING

Some of our pages utilize framing techniques to serve content to from our partners while preserving the look and feel of our website. Please be aware that you are providing your personal information to these third parties and not to HeX 101 LTD.

TESTIMONIAL

We display personal testimonials of satisfied customers on our website in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at accouunts@hex101.co.uk

CHANGES TO THIS POLICY

We may change this Policy from time to time by updating this page. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

QUESTIONS ABOUT THIS POLICY

If you have any questions about this Policy, please contact us at accounts@HeX 101.co.uk

