

HACKEN

# Privacy Notice

## Trust Army

Last updated: **22.05. 2023**

### Intro

Hacken OÜ (“**Trust Army**” or “**we**”) welcomes you. This Privacy Notice (“**Privacy Notice**”) applies to our website, available following the link <https://trustarmy.com/> (“**Website**”) and its subdomain available following the link <https://app.trustarmy.com> (“**Subdomain**”).

The Privacy Notice describes how your personal data is collected, stored, used and what happens when you use the Website or Subdomain.

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## About us

<b>Name</b>	Hacken OÜ.
<b>Address</b>	Kai tn 1-5M, Tallinn city, Harju county, 10111, Estonia.
<b>Email</b>	<a href="mailto:support@hacken.io">support@hacken.io</a> – for general and privacy issues.

## About you

When you visit our Website or Subdomain, you become our user (“**User**”). We divide Users into separate categories for the convenience of understanding the stages of cooperation with us and interaction with the Website or Subdomain.

Type of User	Description
Visitor.	User, who visits Website or Subdomain.
Auditor.	User, who has registered an account in the Subdomain.

**Please note!** We do not knowingly process the personal data of Users under the age of 18. If you are such a User or the legal representative of such a User, please, [contact us](#).

## Personal data

### Sources of data

We receive your data when you visit our Website or Subdomain and interact with them, depending on your actions on the Website or Subdomain.

We may also (although we do not necessarily do so) receive data from third parties. It depends on your settings and the features you use.

### Lawful bases for processing

To process your personal data, we rely on the following lawful bases:

- **performance of the contract** – necessary for the negotiating on, conclusion, and performance of a contract (mainly, the Terms of Service) with you;
- **legitimate interest** – for the development of our services and reasonable for you;
- **consent** – for additional specific purposes (read more below).



## Visitors' data

When you use our Website or Subdomain as the Visitor, we collect some data automatically. We need technical data to operate, support, and improve the Website's functionality.

Type of data	Description	Reasons for processing	Lawful basis
Necessary cookies.	Information that is necessary for the operation of the Website or Subdomain.	The smooth operation of the Website or Subdomain and improving your experience using the Website or Subdomain.	Performance of the contract.
Analytics cookies.	Information is used to understand how the Users interact with the Website or Subdomain by collecting and reporting information.	To monitor the Website's or Subdomain's performance for statistical and analytics purposes.	Consent.
Marketing cookies.	Marketing information used to match relevant advertising to you.	Marketing.	Consent.
Data storage			
Cookies.		Stored during the expiry period provided in our <a href="#">Cookies section</a> or until consent withdrawal.	

## Auditors' data

Data collection moment	Description	Reasons for processing	Lawful basis
When you register an account in the Subdomain.	Name.	To register your personal account.	Performance of the contract.
	Surname.		
	Nickname.		
	User ID (assigned).		
	Your HackenAI's wallet number and user ID.		
When you log in in the Subdomain.	Your discord nickname and user ID.	To identify when you are logging in.	Performance of the contract.
	Nickname.		
	Password.		



When you upload the report on a token in the Subdomain.	Nickname.	To validate a report on a token.	Performance of the contract.
	The report itself and the data contained.		
	User ID (assigned).		
	Metadata from the report's file.		
When you validate someone's report in the Subdomain.	Your nickname.	To check whether your account is trustable to validate someone's reports.	Legitimate interest.
<b>Data storage</b>			
Data that is processed based on the performance of the contract.		Stored during your use of our service and for 3 years after.	
Data that is processed based on legitimate interest.		Stored during your use of our service and for 3 years after.	

### Data received from third parties

We may receive some personal data from third parties.

The amount of data collected, the purposes, and the legal basis for processing is determined by the respective privacy documents of these third parties:

Third parties	Description
Analytics tools	We use analytics tools to understand and promote our business.
Social networks	We use social networks to spread information about our activities.
Messengers	We use messengers to communicate with you in ways that are convenient for you.
CRM systems	We use CRM systems to develop our public organisation.

To get a detailed list of such third parties, [contact us](#).

### Data sharing with third parties

We mainly share your personal data only with our contractors in the scope we need to provide services and technical and customer support, but we may also need to share the data with other parties.



## Details

We share your data on the following grounds:

- 1. Performance of a contract.** We may transfer your data to our contractors and partners for contractual purposes.
- 2. Consent.** We may transfer your personal data based on your explicit consent.
- 3. Compliance with the law.** We may disclose your personal data to third parties to the extent that it is necessary:
  - to comply with a government request, court order, or applicable law;
  - to prevent unlawful use of our Website or Subdomain or policies;
  - to protect against claims of third parties;
  - to help prevent or investigate fraud.

## Data protection

We apply a variety of security measures appropriate to the risks.

Organisational measures	
Staff training	Internal policies and guidelines
Non-disclosure agreements (NDA)	Transfer protection

Technical measures	
Encryption technologies	Two-factor authentication
Backups	Firewalls

Physical measures	
Limited access to premises	Application software security
Stress-tests	Inventory of Authorised and Unauthorised devices



## Data subjects rights

### European Economic Area residents

The Users have the right to interact with its data directly or through a request to us. This section describes these rights and how you can exercise them:

The right	Description
Right to access.	You can request an explanation of the processing of your personal data.
Right to rectification.	You can change the data if it is inaccurate or incomplete.
Right to erasure.	You can send us a request to delete your personal data from our systems. We will remove them unless otherwise provided by law.
Right to restrict the processing.	You may partially or completely prohibit us from processing your personal data.
Right to data portability.	You can request all the data you provided to us and request to transfer data to another controller.
Right to object.	You may object to the processing of your personal data.
Right to withdraw consent.	You can withdraw your consent at any time.
Right to file a complaint.	If your request was not satisfied, you could file a complaint to the regulatory body.

To exercise your rights, [contact us](#). If your request was not satisfied, you can submit a complaint to your local Data Protection Authority. You may find it [here](#).

**UK residents** enjoy the same rights but may lodge a complaint at the other Authority in the UK – Information Commissioner’s Office. You can contact them at 0303 123 1113 or go online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## Cookies

### About cookies

A cookie is a small text file that is placed on your hard drive by a web page server. Cookies contain information that a web server can later read in the domain that issued the cookie to you.

Some cookies will only be in usage if you use certain features or select certain preferences, and some cookies are essential to the Website or Subdomain and will always be used.



According to legislation, we can store cookies on your device if they are strictly necessary for the operation of the Website or Subdomain. For all other types of cookies, we need your permission. You can change or withdraw your consent from the cookies we collect anytime.

## Cookies usage

We use cookies and other technologies to ensure everyone using the Website or Subdomain has the best possible experience. For example, when you use our Website or Subdomain, we may place several cookies in your browser. We use these cookies:

- to enable us to hold session information as you navigate from page to page within the Website or Subdomain;
- to improve your experience;
- to track and analyse usage and other statistical information.

If you decide not to activate cookies or disable cookies later, you may still visit our Website or Subdomain, but your ability to use some features or areas of those offerings may be limited.

## How to turn off cookies

You can generally activate or later deactivate the use of cookies through a functionality built into your web browser. If you want to disable cookies, then you can find instructions for managing your browser settings at these links:

<a href="#">Internet Explorer</a>	<a href="#">Firefox</a>	<a href="#">Chrome</a>	<a href="#">Opera</a>
<a href="#">Microsoft Edge</a>	<a href="#">Vivaldi</a>	<a href="#">Safari</a>	<a href="#">Brave</a>

If you want to learn more about cookies or how to control, disable, or delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for detailed guidance.

If you have any other questions regarding cookies consent withdrawal or their deactivation, please [contact us](#).

## Cookies we use

**Necessary cookies** are required to enable the basic features of the Website or Subdomain, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data. We use the necessary cookies presented below.

Name	Purpose	Expiry period
PHPSESSID	This cookie is native to PHP applications. The cookie stores and identifies a User's unique session ID to manage User sessions on the Website or Subdomain. The cookie is a session cookie and	2 days 1 hour



	will be deleted when all the browser windows are closed.	
cookieyes-consent	CookieYes sets this cookie to remember Users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about the Visitors.	1 year
cky-consent	Used to remember the Users' consent settings so that the Website or Subdomain recognises the Users the next time they visit.	1 year
cookieyes-analytics	Used to remember the consent of Users for the use of cookies in the "Analytics" category.	1 year
cookieyesID	Used as a unique identifier for Visitors according to their consent.	1 year
cookieyes-advertisement	Used to remember the consent of Users for the use of cookies in the "Advertisement" category.	1 year
cookieyes-necessary	Used to remember the consent of Users for the use of cookies in the "Necessary" category.	1 year
cookieyes-functional	Used to remember the consent of Users for the use of cookies in the "Functional" category.	1 year
cky-action	Used to remember the action taken by the User.	1 year
OptanonConsent	Used to store cookie consent preferences.	1 year

**Analytical cookies** are used to understand how Visitors interact with the Website or Subdomain. These cookies help provide information on metrics such as the number of Visitors, bounce rate, traffic source, etc. We use analytics cookies presented below.

Name	Purpose	Expiry
_ga	Registers a unique ID for the session. This is used to generate statistical data on how the Visitor uses the Website or Subdomain.	2 years
_ga_*	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days
_ga_#	Used by Google Analytics to collect data on the number of times a User has visited the Website or Subdomain as well as dates for the first and most recent visit.	2 years
_gid	To distinguish different Users by a non-personal random number instead of using personal information.	24 hours.





_clck	This cookie is installed by Microsoft Clarity to store information on how Visitors use a Website or Subdomain and help in creating an analytics report of how the Website or Subdomain is doing.	1 year
ajs_anonymous_id	This cookie is used to identify a specific Visitor. This information is used to identify the number of specific Visitors on a Website or Subdomain.	1 year
_hjSessionUser_	Collects statistics on the Visitor's visits to the Website or Subdomain, such as the number of visits, average time spent on the Website or Subdomain, and what pages have been read.	1 year
_hjIncludedInSessionSample	Used to determine if a User is included in the data sampling defined by your Website's daily session limit.	30 minutes
_hjAbsoluteSessionInProgress	This cookie is used to count how many times a Website or Subdomain has been visited by different Visitors. This is done by assigning the Visitor an ID so the Visitor does not get registered twice. It does not contain any identifiable information.	1 day
_hjFirstSeen	This cookie is used to determine if the Visitor has visited the Website or Subdomain before or if it is a new Visitor on the Website or Subdomain. The cookie is set so Hotjar can track the beginning of the User's journey for a total session count. It does not contain any identifiable information.	30 minutes
_hjSession_	Collects statistics on the Visitor's visits to the Website or Subdomain, such as the number of visits, average time spent on the Website or Subdomain, and what pages have been read.	30 minutes.

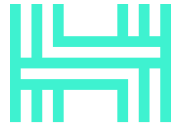
**Marketing cookies** are used to provide Visitors with customised advertisements based on the pages you visited previously and to analyse the effectiveness of the ad campaigns. We use marketing cookies presented below.

Name	Purpose	Expiry
ads/ga-audiences	Used by Google AdWords to re-engage Visitors that are likely to convert to customers based on the Visitor's online behaviour across websites.	Session

## Privacy Notice updates

The Privacy Notice and the relationships falling under its effect are regulated by General Data Protection Regulation for EU citizens.

Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on our Website.



HACKEN

If significant material changes are made to our Website or Subdomain that may affect your privacy and confidentiality, we will notify you by displaying information on the main page of our Website and ask for your consent if necessary.