

PRIVACY POLICY

Last Modified: October 23, 2025

Hedera Hashgraph, LLC (“**Hedera**,” “**we**,” “**our**,” or “**us**”), is committed to protecting your privacy. This Privacy Policy (the “**Privacy Policy**”) explains how your personal information is collected, used, and disclosed by us; what choices are available to you regarding collection, use, and disclosure of your personal information; and our efforts to protect the information you provide to us through the Service (defined below). This Privacy Policy applies to our peer-to-peer, distributed ledger technology-based platform and any other systems or websites, including <https://hedera.com/> and <https://hederacouncil.org/> (together, the “**Sites**”), that link to this Privacy Policy (collectively, our “**Service**”).

By accessing or using our Service, you hereby signify that you have read, understood, and agree to our processing of information in accordance with this Privacy Policy. Please also refer to our [Terms of Use](#), which are incorporated as if fully recited herein. Terms defined in the [Terms of Use](#) that are not defined herein shall have the same definition as in the [Terms of Use](#).

The Service may contain links to third-party distributed applications that are not owned or controlled by Hedera. Hedera does not endorse or assume any responsibility for any such third-party distributed applications, websites, information, materials, products, or services. If you access and/or provide data to a third-party service or a third-party distributed application from the Service, you do so at your own risk, and you understand that this Privacy Policy and the [Terms of Use](#) do not apply to your use of such third party sites and services.

This Privacy Policy is subject to change. If our information retention or usage practices change, we will let you know by posting our updated Privacy Policy changes on the Sites and/or otherwise making you aware of the changes. Your continued use of the Service following our notice of changes to this Privacy Policy (or other method of legal acceptance) means you accept such changes. Please refer to the “Effective Date” above to see when this Privacy Policy was last updated. For more information regarding changes to the Privacy Policy please refer to Section 15.

If you have any questions about this Privacy Policy or how we use your personal information, please contact us at contact@hedera.com.

Territoriality

Regardless of where our servers are located, your personal data may be processed by us in the United States where data protection and privacy regulations may or may not be comparable to the levels of protection in other parts of the world. In all instances in this Privacy Policy, “our servers” means servers that we own or on which the Service is hosted, or which are otherwise utilized by the Service. BY VISITING THE SITES AND USING THE SERVICE, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY INFORMATION COLLECTED OR OBTAINED BY US THROUGH VOLUNTARY SUBMISSIONS, AND TO THE EXTENT POSSIBLE, THAT U.S. LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING.

This Privacy Policy may be subject to the provisions of the General Data Privacy Regulation (EU) 2016/679 (the “**GDPR**”) the United Kingdom Data Protection Act 2018 (the “**U.K. GDPR**”), the California Consumer Privacy Act of 2018, as amended (the “**CCPA**”) the Nebraska Data Privacy Act (the “**NDPA**”), the Texas Data Privacy and Security Act (the “**TDPSA**”) and other applicable privacy laws. Under the GDPR, U.K. GDPR, and other applicable data privacy laws, Hedera is a “Controller”, or similarly defined term, in a similar position (with respect to your personal data) in that it will determine the means and purposes of the collection and use of your data, and you will be a “data subject” or the analogous term used under the applicable law if you reside in that state or country. For example, under the CCPA, we are a “Business”, and you, if you are an individual residing in California, are a “consumer” with certain protected privacy rights concerning your “Personal Information.” We will take commercially reasonable steps to maintain compliance with applicable privacy laws. Your personal data or Personal Information, as applicable, combined with any other information that may identify you as a person, is referred to in this Privacy Policy as Personally Identifiable Information (collectively, “**PII**”).

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1. ABOUT US

Hedera Hashgraph, LLC, is Delaware a limited liability company. As discussed above, we provide the Service in accordance with the [Terms of Use](#) and collect information in accordance with this Privacy Policy.

Our primary locations and contact information are as follows:

10845 W Griffith Peak Drive
Suite 200
Las Vegas, Nevada 89135
Email: contact@hedera.com

2. WHAT INFORMATION DO WE COLLECT

The categories of information we collect can include:

a. Requested Information

We collect certain personal information about you, which may be supplied when you register for the Service, when you create or update your account, when you contact us or use the Service, from third parties, or otherwise when you submit such information including:

- Identity Information, such as your name, date of birth, occupation, and employer.
- Contact Information, such as your phone number, email address, social media account(s), physical address, and geographic area (including postal or zip code).
- Profile Information, such as your username or account ID, password or key, and other information you provide when creating an account or otherwise registering to use the Service.
- Account and Communication Preferences Information, such as your preferences in receiving marketing and other communications from us.
- National/State Identity Information, such as your driver's license, national identity card, passport, or other photo identity.
- Third Party Supplied Information: From time to time, we may receive information about you from third parties, such as our service providers. We may also collect information about you that is publicly available.
- Employment Information, such as your employer's or company's name, your job title, your industry of employment, and the function of your employment.

We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages. We may also send you Service-related emails or messages (e.g., account verification, updates to features of the Service, technical and security notices). For more information about your communication preferences, see Section 7 below.

You may provide us with information when you interact with us through use of the Service. We may retain such information in order to provide you with the Service, and you agree that we may share

this information as needed with other users in order to resolve any issues that may arise between you and another user of the Service.

b. User Provided Information

We collect any communications between you and us and any other information you provide to us, including, without limitation:

- Your Interests, such as your interests in developing and/or launching a distributed application, interests in learning about hosting and running a node, interests in becoming a system integration partner, interests in supporting the Distributed Ledger Foundation and/or the Free + Fair voting initiative.
- Verification Information: If you intend to receive tokens from us, you will be asked to provide us or our third party service providers with the following information in order to meet our know-your-customer (“KYC”) and anti-money laundering (“AML”) checks: name, email, address, date of birth, phone number, copies of driver’s license or passport, and any other information necessary to confirm your status (collectively, “**Verification Information**”). This Verification Information will be used to screen you against Office of Foreign Assets Control watch lists as well as gather information about you for Bank Secrecy Act compliance purposes.
- User Content: We may collect information about how you use the Service, your actions on the Service, and content you store on or post to the Service, and any content you provide through other functionalities on the Service (“**User Content**”).

Please remember that Hedera may, but has no obligation to, monitor, record, and store User Content in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, or to protect and defend our rights and property. By using the Service, you consent to the recording, storage, and disclosure of such communications you send or receive for these purposes.

c. Non-personal Information

Non-personal information is non-personally identifiable or anonymous information about you, including but not limited to:

- Technical Data, such as your internet protocol (“IP”) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Service.
- Usage Data, such as information about how you use the Sites, and metadata associated with any communications we receive from you.
- Metadata, such as which pages on the Sites are accessed most frequently, how pages and features are used, average time spent on a page, search terms entered, and similar non-personal data.

Tracking IP addresses is one method of automatically collecting information about your activities online and information volunteered by you. An IP address is a number that is automatically assigned to your device whenever you surf the internet.

If non-personal information is paired to any of your PII, we will treat the non-personal information as if it were also PII.

d. Aggregate Information

We may also collect anonymous, non-identifying, and aggregated information such as the type of browser you are using, the type of operating system you are using, the date and time of any request, language preference, referring site, and the domain name of your internet service provider.

e. Other/Sensitive Personal Data

The Service is not intended to be used for collecting, storing, or transmitting special categories of personal data (as defined under the U.K. GDPR or the GDPR), nor political opinions or criminal convictions and offences.

3. HOW ARE WE COLLECTING INFORMATION

We collect PII in various ways:

- We collect PII directly from you when you provide it to us. For example, we collect PII in the following circumstances:
 - If you create an account with us, you will be required to provide your identity, contact, and log-in data. You may be required to create an account to access, utilize, or download certain materials on the Sites, or to gain access to the full utility of the Service.
 - When you sign up to one of our mailing lists, you will provide us with your identity and contact information.
 - When you register for one of our sweepstakes or competitions.
- We collect certain PII automatically. We collect your technical and usage data, as described above, as you use the Sites and the Service. Some of this data is collected using web beacons, pixel tags, first (session and persistent) and third-party cookies, embedded links, and other commonly used information-gathering tools.
- We collect PII from third parties. We occasionally obtain PII from our third party partners and collaborators.

4. FOR WHAT PURPOSE ARE WE COLLECTING INFORMATION

We are collecting your PII for the following purposes:

- **Contractual Performance**: Our collection of your PII may be necessary for the performance of certain contractual relationships we have with you.
- **Legal Obligations**: Our collection of your PII may be necessary for compliance with our legal obligations under the GDPR, U.K. GDPR, CCPA, or other applicable laws.
- **Legitimate Business Interests**: Where in our legitimate interests or the legitimate interests of other entities, or our third-party partners, and branches in our group of companies (provided

said interests are not overridden by your interests and fundamental rights and freedoms) we may collect your PII for the following purposes:

- to contact you and respond to your requests and inquiries;
 - for business administration, including statistical analysis;
 - to personalize your visit to, and use of, the Service;
 - for fraud prevention and detection and to comply with applicable laws, regulations, or codes of practices; and
 - in the case of Verification Information only, for the purpose of receiving tokens through our Service, including without limitation, to ensure that you meet our KYC and AML checks.
- Improvement to the Service and the Sites. We will collect your technical data and usage data to make improvements to the Sites, perform system maintenance, offer user support, and for troubleshooting.
 - Consent to Collect: We may use your PII to respond to your inquiries and to fulfil your requests for information. If you sign up to our mailing lists, we will send you updates and marketing information that you have consented to receive. Likewise, we may need your contact, identity, technical and/or usage data to respond to a question you have asked us, to enroll you in any of our sweepstakes, or to give you access to certain functions of the Service.

Additionally, our Service permits you to remove any and all of your PII that we may hold by submitting a delete request to the Service, as detailed below in Section 13. If you withdraw your consent or remove your PII from the Service and we have no alternative lawful reason to process your PII, this may affect our ability to provide you the full scope of the Service.

In summary, we collect your PII in order to provide you with the Service. Certain other PII is processed for our legitimate interests in cases where this does not result in prejudice to you. Certain other personal data is processed based on consent.

5. HOW WE USE COOKIES AND OTHER TRACKING TECHNOLOGY TO COLLECT INFORMATION

We, and our third-party partners, automatically collect certain types of usage data when you visit our Sites and use the Service, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, embedded scripts, location-identifying technologies, file information, and similar technology (collectively, “**Tracking Technologies**”). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp (a unique ID that allows us to uniquely identify your browser, mobile device, or your account), and other such information. We also collect information about the way you use our Service, for example, the website from which you came and the website to which you are going when you leave our website, the pages you visit, the links you click, how frequently you access the Service, whether you open emails or click the links contained in emails, whether you access the Service from multiple devices, and other actions you take on the Service.

When you access our Service from a mobile device, we may collect unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers, Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g., latitude and/or longitude) or similar information regarding the location of your mobile device, or we may be able to approximate a device's location by analyzing other information, like an IP address. We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure traffic and usage trends for the Service and to understand more about the demographics of our users. You can learn more about Google's practices at <https://policies.google.com/technologies/partner-sites> and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>. We may also work with third-party partners to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

We use or may use the data collected through Tracking Technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) recognize and contact you across multiple devices; (d) provide and monitor the effectiveness of our Service; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our Service; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Service.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

We and our third-party partners may also use cookies and Tracking Technologies for advertising purposes. For more information about Tracking Technologies, please see Section 8 below.

6. SHARING OF YOUR INFORMATION

We may share your PII in the instances described below. For further information on your choices regarding your information, see Section 7 below.

Remember, we allow you to submit content to the Service and all transactions are public and traceable. **Your information, including your Account ID, public key, any information disclosed in the memo field, and any other PII submitted by you, will be available publicly by default when you make a transaction and submit content to the Service or other public spaces of the Service. Except for transactions, which only remain on the Service temporarily, all other PII you post to the Service will remain on the Service until you choose to remove it by submitting a delete request to the Service. Notwithstanding the foregoing, PII that you provide directly to Hedera during registration will not be made public. Please do not submit PII to the Service you**

would not want to be public, unless it is provided as part of the registration process. As noted above, any removal of PII may affect the functionality of the Service.

We may share your PII with:

- The public and other members of the Service. Your profile information and content you post to public areas of the Service, including public groups, will be viewable by others on the Service and the public.
- Other users of the Service. We share your information with third parties with whom you communicate on the Service. You control who you want to communicate with and what information you share.
- Third parties at your request. For example, you may have the option to share your activities on the Service with your friends through email, text, or on various social media sites.
- Other companies and brands owned or controlled by Hedera. These companies will use your PII in the same way as we can under this Privacy Policy.
- Third parties with whom we partner to provide contests and sweepstakes, which will usually be identified by name in the Official Rules of the contest or sweepstakes.
- Third-party vendors and other service providers that perform services on our behalf, as needed to carry out their work for us, which may include identifying and serving targeted advertisements, providing mailing services, providing KYC and AML verification services, providing tax and accounting services, contest fulfilment, web hosting, or providing analytic services.
- Other parties in connection with a company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party, or in the event of a bankruptcy or related or similar proceedings.
- Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of Hedera, our visitors, or others.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

When we transfer your data outside of the U.K. or the European Economic Area (“EEA”) to a country which the Information Commission’s Office or the European Commission, respectively, does not deem to have adequate data privacy laws, we will ensure that such transfer is in accordance with applicable data privacy laws.

7. CONTROL OVER YOUR INFORMATION

Please email us at contact@hedera.com to access you PII that we have collected, or to correct errors in such PII. If you would like to opt-out of receiving any promotional email that we send you, please click on the unsubscribe link at the bottom of any such email. We will also promptly stop using your PII and remove it from our servers and database at any time upon your e-mail request, where required

by law. For more information about your rights over your PII please see Section 13 of this Privacy Policy

If you would like to opt out of your PII being included (on a forward-looking basis) in the Service, you may do so here, <https://hedera.com/contact>. We may retain some PII after an opt out to the extent necessary to honor your request in the future. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access, making corrections, or removing your PII.

For more information on accessing your PII, correcting errors in your PII, or our available opt-out procedures please see Section 13 of this Privacy Policy.

8. THIRD-PARTY TRACKING AND ONLINE ADVERTISING

We may share, or we may permit third party online advertising networks, social media companies and other third-party services, to collect, information about your use of our website over time so that they may play or display ads on our Service, on other devices you may use, and on other websites, apps or services, including on Facebook. Typically, though not always, the information we share is provided through cookies or similar Tracking Technologies, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the Sites and other information. We may also share a common account identifier (such as an email address or user ID) to help us identify you across devices.

We and our third-party partners use this information to research the market and/or make the advertisements you see online more relevant to your interests. As noted above, depending on your browser or mobile device, you may be able set your browser to delete or notify you of cookies and other Tracking Technologies by actively managing the settings on your browser or mobile device. You may also be able to limit interest-based advertising through the settings on your mobile device by selecting “limit ad tracking” (iOS) or “opt-out of interest-based ads” (Android). To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative’s online resources, at <https://thenai.org/how-to-opt-out/>, and/or the Digital Advertising Alliance’s resources at <https://optout.aboutads.info/>, and you may also adjust your ad preferences through your Facebook settings. Some of these opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers or delete the opt-out cookie, you may need to perform the opt-out task again. You may also be able to opt-out of some – but not all – interest-based ads served by mobile ad networks by visiting <https://youradchoices.com/appchoices> and downloading the mobile AppChoices app.

Google Analytics and Advertising. We use Google Analytics to recognize you and link the devices you use when you visit our Sites or Service on your browser or mobile device, log in to your account on our Service, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the service. Google Analytics allows us to better understand how our users interact with our Service and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site “How Google uses data when you use our partners’ sites or apps” located at <https://policies.google.com/technologies/partner-sites>. You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Ad-On here <https://tools.google.com/dlpage/gaoptout>.

We may also utilize certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to the Service. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://myadcenter.google.com/home?hl=en&sasb=true&ref=ad-settings>, or by visiting Network Advertising Initiative's online resources at <https://thenai.org/how-to-opt-out/>.

9. HOW WE STORE AND PROTECT YOUR INFORMATION

The safety of your PII is important to us, and we use various technical and organizational measures to ensure that your data is secure.

Data storage and transfer: Your information collected through our Service may be stored and processed in the United States or any other country in which Hedera or its affiliates or service providers maintain facilities. If you are located in the EEA or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including PII, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and we will take all steps reasonably necessary to ensure that any personal data are treated securely and in accordance with this Privacy Policy. To the extent that Hedera processes any personal data protected by GDPR, the U.K. GDPR, or other applicable laws, in the United States, you acknowledge that Hedera shall be deemed to provide, and to have provided, adequate protection (within the meaning of GDPR and U.K. GDPR) for any such personal data.

For individuals residing in the EU, we store personal data for as long as necessary to fulfill the purposes for which we collect the data (see above under Section 4) and in accordance with our legal obligations and legitimate business interest, except if required otherwise by law.

Data retention: Unless you request removal of your PII by submitting a delete request to the Service, we will retain your PII only for as long as reasonably necessary to maintain the Service, to meet legal and accounting obligations, and for the purposes described in this Privacy Policy, or until our receipt of your opt-out request, or that we delete the PII, or remove the PII from our servers. We may anonymize and/or aggregate PII and store it in order to analyze aggregate metrics and trends.

Keeping your information safe: We care about the security of your information and employ physical, administrative, and technological safeguards designed to preserve the integrity and security of all information collected through our Service. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%. No data transmission over the internet or data storage solution can ever be completely secure. As a result, although we take industry-standard steps to protect your information (e.g., strong encryption, and limiting access through access controls to only those employees whose job function truly requires access to your PII) we cannot ensure or warrant the security of any information you transmit to or receive from us or that we store on our servers.

In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

10. SWEEPSTAKES PRIVACY

To participate in our sweepstakes or contests, we may require you to register and provide us with PII and certain other information including a username and password. This Privacy Policy applies to our data practices for all sweepstakes we may administer online, whether hosted on the Sites or in collaboration with one of our third-party partners. Where we do host, or permit registration for, one of our sweepstakes or contests on third-party sites, such as our Hackathons, this Privacy Policy applies only to our privacy practices. See Section 12, below, for more details on privacy practices for the hosts of those third-party sites. We will use the information you provide us for administering the sweepstakes and those additional purposes disclosed at the time of registration for the sweepstakes. You should carefully review the Official Rules of any sweepstakes or contest in which you participate and any amendments to this Privacy Policy those rules may contain, for the purposes of that sweepstake or contest.

11. CHILDREN'S PRIVACY

Hedera does not knowingly collect or solicit any information from anyone under the age of 13 on the Service, and we comply with all applicable privacy laws including the CCPA, the Children's Online Privacy Protection Act, associated Federal Trade Commission rules for collecting PII from minors, the GDPR, and the U.K. GDPR. Please see the FTC's website (www.ftc.gov) for more information. If you have concerns about the Sites, wish to find out if your child or ward has accessed our Service, or wish to remove your child's or ward's PII from our servers, please contact us at contact@hedera.com. If you believe that your child or ward under the age of 13 has gained access to our Sites without your permission, please contact us at contact@hedera.com.

In the event that we learn that we have inadvertently collected PII from a child under age 13, we will delete that information as quickly as possible.

12. LINKS TO OTHER WEB SITES AND SERVICES

The Service may contain links to and from third-party websites of our business partners, advertisers, and social media sites and our users may post links to third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third-party sites.

13. GENERAL PRIVACY RIGHTS

a. Your Rights:

i. Requestable Rights:

You have the following rights with respect to our practices regarding your PII, each of which may be exercised upon your submission of a request made pursuant to the method described in Subsection b of this Section 13:

- The Right of Confirmation. This is your right to confirm whether we are processing your PII.
- The Right of Access. This is your right to be informed about what PII we are processing, why, and who else the data may be passed to. Your right of access also includes the right to know the categories of PII collected by us. In the previous 12 months, we have collected the following categories of PII about users of the Service:
 - Identifiers. Identifiers can be your name, mailing address, email address, technical identifiers (device identifier, IP address, cookies, beacons, pixel tags, mobile ad identifiers), account names, Verification Information, and similar information;
 - Internet/Network Activity. Internet Activity Information includes browsing history, cookies, search history and a Consumer's interaction with a website;
 - Employment Information. Employment Information includes place of employment, job title, industry type, and function of role;
 - Geolocation Data. Such geolocation data includes GPS data;
 - Commercial information. Such information includes the records of goods and services that you have purchased or registered for; and
 - Inferences. Inferences drawn from any other category of PII.
- The Right to Amend/Correct. This is the right to have our records of your PII corrected or amended if what we hold is incorrect or outdated in some way.
- The Right to Deletion. Subject to certain exceptions, and limitations, this is the right to have our record(s) of your PII deleted.
- The Right to Data Portability and Right to Copy. This is the right to request a copy of our records of your PII provided to you in a structured, commonly used, and machine-readable format that would allow you to transmit said data to another provider of our Service without hinderance.
- Right to Non-Discrimination. In the event that you exercise one of your rights described in this policy, you will not be discriminated by us in any way, including by the denial of goods or services, providing you a different level of goods or services, or charging you different prices or rates for the goods or services, unless the change in price is reasonably related to the value we receive from your PII. Please be aware that certain functions on the Sites and use of the Service is predicated on your having an account. Your exercising of your right to delete will not prohibit you from creating a new account, but if you choose to delete your account, you will not be able to access those functions until you create a new account.

These Requestable Rights are additionally guaranteed unto the residents of several U.S. states under their respective comprehensive data privacy protection laws. In accordance with the chart below, residents of the described states enjoy a statutory guarantee of rights substantially similar, or the same, to those described above.

	Confirm	Access	Correct/ Amend	Delete	Copy	Non-Discr im
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California	X	X	X	X		X
Colorado	X	X	X	X	X	X
Connecticut	X	X	X	X	X	X
Delaware	X	X	X	X	X	X
Indiana	X	X	X	X	X	X
Iowa	X	X		X	X	X
Kentucky	X	X	X	X	X	X
Maryland	X	X	X	X	X	X
Minnesota	X	X	X	X	X	X
Montana	X	X	X	X	X	X
Nebraska	X	X	X	X	X	X
New Hampshire	X	X	X	X	X	X
New Jersey	X	X	X	X	X	X
Oregon	X		X	X	X	X
Rhode Island	X	X	X	X	X	X
Tennessee	X	X	X	X	X	X
Texas	X	X	X	X	X	X
Utah	X	X		X	X	X
Virginia	X	X	X	X	X	X

The scope and guarantee of rights secured by each of the above states' comprehensive data protection statutes may vary. If you are a resident of any of the above-described states, please review your states' comprehensive data protection statute to better understand your rights.

ii. Opt-Out/Opt-In Rights:

You have the right to opt-out of the following usages of your PII. Electing to opt-out of any or all of the following usages will oblige us into desisting the use of your PII in the corresponding manner regardless of whether we have ever implemented such use or intend to implement such use at some future time. You may exercise your opt-out rights in the manner described in Section 13, Subsection b of this Privacy Policy.

- **Targeted Advertising.** You have the right to stop and prevent our usage of your PII for the purposes of targeted advertising.
- **Sale of PII.** You have the right to stop and prevent our sale of your PII. We do not engage in the sale of your PII.
- **Profiling/Automated Decision Making.** You have the right to stop and prevent our processing (automated or otherwise) of your PII for the purpose of evaluating, analyzing, or predicting an identified or identifiable aspect, condition, characteristic, interest, preference, or position, or for making automated decisions that produce legal or similarly significant effects about you. We do not engage in profiling.

You have the right to opt-in to the following usages of your PII. Electing to opt-in to of any or all of the following usages will permit us to use your PII in the corresponding manner regardless of whether we have ever implemented such use or intend to implement such use at some future time.

You may exercise your opt-in rights in the manner described in Section 13, Subsection b of this Privacy Policy.

- **Processing of Sensitive Data.** You have the right to opt-into the processing of your sensitive data. Sensitive data is information revealing an individual's racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sex life, sexual orientation, status as a transgender or nonbinary individual national origin, citizenship or immigration status, genetic or biometric data, personal data collected from a known child, precise geolocation data. For us to process your sensitive data, you must first opt-in to such processing.

If you have previously opted into the processing of sensitive data, you have the right to opt-out and stop or prevent our continued processing of your sensitive data. We do not presently collect or process sensitive data.

- **Collection of a Minor's PII.** As noted in Section 11 of this Privacy Policy, we do not knowingly collect the PII of any minor person under the age of 13. Additionally, we will not process the PII or sensitive data of any person under that age of 13, or any information that could otherwise be combined with the PII or sensitive data of any person under the age of 13, without the express and verifiable permission of that minor's parent or guardian. If you are the parent or guardian of a child or ward under the age of 13 that uses the Service, you have the right to opt-in to our processing of that child or ward's PII, sensitive data, or other information that could otherwise be combined with that child or ward's PII or sensitive data.
- **Biometric Data.** Biometric data is information derived from certain biometric identifiers such as retina or iris scans, fingerprints, voiceprints, hand or face geometry, or other unique biological pattern or characteristic that is used to identify a specific individual. While we consider biometric data as a subset of sensitive data, due to its highly personalized nature you have additional rights regarding this subset. Severable from your right to opt-into the collection of your sensitive data, you have the right to opt-into the collection of your biometric data. WE DO NOT COLLECT BIOMETRIC DATA.

The right to opt out of, or opt-into, certain usages of your PII are additionally guaranteed unto the residents of several states under their respective comprehensive data privacy protection statutes. In accordance with the chart below, residents of the described states enjoy a statutory guarantee of the corresponding opt-out or opt-in right, substantially similar, or the same, to those described above.

	Targeted Advertising	Sale of PII	Profiling/ Auto Decision Making	Sensitive Data Processing		Opt-In Minors	Bio-metric Data
				Opt-In	Opt-Out		
California	X	X	x		X	X	
Colorado	X	X	X	X		X	
Connecticut	X	X	X	X		X	
Delaware	X	X	X	X		X	
Illinois							X
Indiana	X	X	X	X		X	
Iowa		X			X	X	
Kentucky	X	X	X		X	X	
Maryland	X	X	X	X		X	
Minnesota	X	X	X	X		X	

Montana	X	X	X	X		X	
Nebraska	X	X	X	X		X	
Nevada		X		X		X	
New Hampshire	X	X	X	X		X	
New Jersey	X	X	X	X		X	
Oregon	X	X	X	X		X	
Rhode Island	X	X	X	X		X	
Tennessee		X		X		X	
Texas	X	X	X	X		X	X
Utah	X	X			X	X	
Virginia	X	X	X	X		X	X

The scope and guarantee of out-of-state rights secured by each of the above states' comprehensive data protection statutes may vary. If you are a resident of any of the above-described states, please review your states' comprehensive data protection statute to better understand your rights.

iii. Honoring Opt-Out Preference Signals:

We honor your election to you use an Opt-Out Preference Signal. An Opt-Out Preference Signal ("Signal"), or Global Privacy Control, is a simple and easy way for you to automatically exercise your right to opt-out of certain data usages of your PII. If you have enabled a Signal to opt-out of certain usages of your PII either (i) generally and universally; or (ii) particularly with regards to our Sites, we will receive a notification your intention to opt-out of said usages when you use the Service. Upon receiving the Signal notification, we will ask you to confirm your intention to opt out of the certain usages of your PII. Please be aware that for the purposes of this confirmation, we will confirm your location using your IP address.

b. Exercising Your Rights:

We offer two principal methods for you to exercise your rights described this Privacy Policy.

- First, you may submit a request to exercise any or all of your rights by contacting us at contact@hedera.com. In the subject line of your email please include your first and last name and the phrase "Privacy Rights Request." In the body of the email please include (1) which Requestable Rights or Opt-Out/Opt-In Rights you would like to exercise; and (2) your state of residence.
- Second, you may exercise your Opt-Out/Opt-In Rights here: <https://hedera.com/contact>.

Regardless of which method you choose to submit your privacy rights request, we will acknowledge receipt of your request within ten (10) business days and will substantively respond within forty-five (45) calendar days. Before we respond to any requests relating to your PII, we will take steps to reasonably verify the identity of the person making the request to make sure it's you, or your authorized agent. We do this to avoid disclosing your information to third parties and bad actors, not to inconvenience you in any way. As the sensitivity of the information subject to the request increases, so will our verification efforts. If an agent is acting on your behalf, we will need to also verify the agent's identity and their authority to act on your behalf. If the identity of the party

submitting the request cannot be reasonably verified, either as you or your agent, then in order to protect you, we shall not honor the applicable request.

If we should deny your privacy rights request for whatever reason, we will provide you a detailed explanation of our determination. We will provide you a file number to refer to your privacy right request denial for purposes of any appeal you may wish to exercise (as detailed below). You may submit, and we will respond, to up to two (2) privacy rights requests per twelve (12) months, free of charge.

Granted requests, including requests to delete PII, will affect all PII that we hold regarding you. This includes any PII we may have regarding you that we did not collect from you or from your use of the Service. If we grant your request to exercise any of your Opt-Out Rights, you may rescind your opt-out election at any time by emailing us at contact@hedera.com.

You may exercise your rights described in Section 13 of this Privacy Policy through the use of an agent. Where necessary, we will take reasonable steps to ensure the legitimacy of the agency relationship. If we cannot confirm that a party representing themselves to be your agent is truly your elected agent, we reserve the right to not honor any of the Requestable Rights or Opt-Out Rights described in Section 13 of this Privacy Policy that are purported to be submitted on your behalf. A known child's parent or legal guardian may invoke on behalf of the child that child's rights described in Section 13 of this Privacy Policy.

We will respond free of charge, to up to two privacy rights requests per year per user. We reserve the right to charge a reasonable fee to cover administrative costs for complying with any request that is manifestly unfounded, excessive, or repetitive, or in the alternative, choose to deny any request that is manifestly unfounded, excessive, or repetitive. If we determine that your request is manifestly unfounded, excessive, or repetitive, we will provide you our reasoning underpinning that assessment.

We do not require you to create an account or provide additional information beyond what is necessary in order to exercise your rights under Section 13 of this Privacy Policy. We will never We will never discriminate against you due to your election to exercise your rights under this Privacy Policy.

c. Privacy Right Request Appeal

If we should deny your privacy right request, you may submit an appeal of that determination via email to contact@hedera.com. In the subject line of your appeal email, please include the file number provided with the initial denial of your privacy right request and the word "APPEAL". In the body of your appeal email please detail (1) the nature of your request, (2) your state of residence; and (3) your reasoning for why the initial denial should be reversed.

We will acknowledge receipt of your appeal within ten (10) business days and will substantively respond within forty-five (45) calendar days. Whether granted or denied, we will provide you with our reasoning for the determination on your appeal. We retain copies of appeals for up to twenty-four (24) months.

Certain states allow residents to submit a complaint regarding a denied appeal of a rejected privacy rights request, pursuant to those states' comprehensive data privacy laws. If you are a resident of any

of the following states depicted in the chart below, and we have denied your appeal, we will provide you information and a mechanism for you to submit a complaint to that State's designated officer.

	Officer	Link
Colorado	Attorney General	https://complaints.coag.gov/s/contact-us
Connecticut	Attorney General	https://www.dir.ct.gov/ag/complaint/e-complaint.aspx?CheckJavaScript=1?CheckJavaScript=1
Iowa	Attorney General	https://www.iowaattorneygeneral.gov/for-consumers/file-a-consumer-complaint/complaint-form
Kentucky	Attorney General	https://secure.kentucky.gov/formservices/AttorneyGeneral/ConsumerMediationForm
Maryland	Division of Consumer Protection	https://portal.oag.state.md.us/cpdportal/
Minnesota	Attorney General	https://www.ag.state.mn.us/office/Forms/ConsumerAssistanceRequest.asp
Nebraska	Attorney General	https://ne.accessgov.com/ago/Forms/Edit/ago/127a97b0-7a3f-438a-8e79-36006e04b774/1
New Hampshire	Attorney General	https://www.doj.nh.gov/citizens/consumer-protection-antitrust-bureau/consumer-complaints
New Jersey	Division of Consumer Affairs (Department of Law and Public Safety)	https://www.njconsumeraffairs.gov/Pages/Consumer-Complaints.aspx
Tennessee	Attorney General	https://www.tn.gov/attorneygeneral/working-for-tennessee/consumer/file-a-complaint.html
Texas	Attorney General	https://consumerprotection.texasattorneygeneral.gov/consumercomplaintportal/s/flow/TCP Complaint Input Data Privacy
Virginia	Attorney General	https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint

d. UK PRIVACY RIGHTS

For the purposes of applicable data protection laws in the U.K. including the U.K. GDPR we are a data controller of any PII collected by us. In simple terms, this means that we (i) “Control” what PII of yours is collected; and (ii) make certain decisions on how to use and protect your PII, but only to the extent that we have informed you about the use or such use is otherwise permitted by law. If you have any questions about this subsection and its application to you, please contact us via email at contact@hedera.com. If your PII is protected by the U.K. GDPR, we rely on the following legal bases to process such PII: your consent; our legitimate interests; and to comply with applicable law.

- **Your PII Rights:** In addition to the rights provided under this Section 13, to the extent that your PII is protected by the U.K. GDPR, you have the following rights:
 - **Restrict use.** You may request that we restrict our processing of your PII (other than storing it), if: (i) you contest the accuracy of the PII; (ii) you believe the processing is against applicable law; (iii) you believe that we no longer need your PII for the

purposes for which it was collected; or (iv) you have objected to the processing (as set forth in the bullet immediately below) and we are verifying whether our legitimate grounds to process your PII override your own rights. Please note, this right to restrict processing is not absolute, and we will inform you where an exemption applies, or where the restriction is no longer available, when we reply to your request.

- Object. You have the right to object to the processing of your PII where we are relying on a legitimate interest as our legal basis for processing and there is something which makes feel our processing of your PII impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your PII for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your PII which override your rights and freedoms.
- Withdraw consent. If you previously gave us your consent to allow us to process your PII for a particular purpose, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent. However, if you withdraw your consent, we may not be able to provide certain services to you moving forward.
- Complain to the ICO: You also have the right to make a complaint at any time to the U.K. Information Commissioner's Office (<https://ico.org.uk>) if you do not agree with the manner in which we have processed your PII or responded to your requests in relation to your PII.

Hedera generally does not collect Special Categories (as defined by the U.K. GDPR) of PII, but will do so from time to time, to the extent strictly necessary to comply with applicable law.

We will retain your PII only for so long as we need the PII for the purposes it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required under applicable law. To determine the appropriate retention period for PII, we consider the amount, nature, and sensitivity of the PII, the potential risk of harm from unauthorized use or disclosure of your PII, the purposes for which we process your PII and whether we can achieve those purposes through other means, and the applicable legal requirements.

e. EU PRIVACY RIGHTS

For the purposes of applicable data protection laws in the EEA including the GDPR we are a data controller of any PII collected by us. In simple terms, this means that we (i) "Control" what PII of yours is collected; and (ii) make certain decisions on how to use and protect your PII, but only to the extent that we have informed you about the use or such use is otherwise permitted by law. If you have any questions about this subsection and its application to you, please contact us via email at contact@hedera.com. If your PII is protected by the GDPR, we rely on the following legal bases to process such PII: your consent; our legitimate interests; and to comply with applicable law.

- Your PII Rights: In addition to the rights provided under this Section 13 to the extent that your PII is protected by the U.K. GDPR, you have the following rights:
 - Right to Restriction. The right to obtain the restriction of the processing undertaken by us on your PII in certain circumstances, such as where the accuracy of the PII is contested by you, for a period enabling us to verify the accuracy of that PII.

- Right to Object. You have a right to object to processing based on legitimate interests and direct marketing.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this Privacy Policy.

You also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at <https://ec.europa.eu/newsroom/article29/items/612080>.

14. NOTICES TO U.S. STATE RESIDENTS

a. NOTICE TO CALIFORNIA RESIDENTS

The CCPA applies our practices with respect to the PII of California residents (“**CA Consumers**”). In addition to the rights described in Section 13 above, under the CCPA, CA Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right to Access (Collect). As a CA Consumer, your Right of Access in Section 13 includes any PII we have collected about you and disclosed in the previous 12 months including the categories of PII collected by us (as described in Section 13), the specific pieces of PII collected, the source(s) of such PII, and the business purpose for collecting such PII. In addition to the categories described in Section 13, in the previous 12 months, we have also collected:
 - Personal Information Under the California Consumer Records Law (Cal. Civ. Code §1798.80) (“CCRLPI”), which includes your name, mailing address, email address, technical identifiers, and similar information;
- Right to Access (Sale/Share). As a CA Consumer, you also have the right to request that we tell you which of your PII we have disclosed for a business purpose, sold, and/or shared in the previous 12 months. To the extent we do any of the foregoing, the CA Consumer shall receive the specific categories of PII disclosed, sold, or shared, and the types of entities that receive this PII.

IN THE PAST 12 MONTHS, WE HAVE NOT DISCLOSED, SOLD, OR SHARED PII AND WE DO NOT INTEND TO DO SO WHILE THIS VERSION OF THE PRIVACY POLICY IS EFFECTIVE.

- Right to Limit the Use and Disclosure of Sensitive Personal Information. Residents of California may, at any time, request that we cease using or disclosing any sensitive personal information that we have collected about them to only such uses as permitted by the CCPA. We have not in the past 12 months collected Sensitive Personal Information on the Sites and not anticipate collecting such PII during the time this version of the Privacy Policy is effective.
- Right to Opt-Out of Selling and/or Sharing of Your PII. CA Consumers have the right to opt-out of the “sale” or “sharing” (as such terms are defined by the CCPA) of their PII to third parties. While we do not believe that we are “selling” or “sharing” your PII with third

parties, to the extent a court or regulator disagrees, you can request that all or a portion of your PII in our possession or control not be “sold” or “shared” by clicking the “Do Not Sell or Share My Personal Information” link, available here <https://hedera.com/contact>, and on our Sites and following the instructions to submit your request.

- **Shine the Light**. California law also allows its residents to request information regarding our disclosures to third parties in the prior calendar year, if any, of their personally identifiable information. To make such a request, please contact us at contact@hedera.com with “Shine the Light” in the subject line. Please include enough detail for us to locate your file; at a minimum, your name, email, and username, if any. We will attempt to provide you with the requested information within 30 days of receipt. We reserve our right not to respond to requests sent more than once in a calendar year, or requests submitted to an address other than the one posted in this notice. Please note that this law does not cover all information sharing. Our disclosure to you will only include information covered by the law.
- **Right to be Notified of a Financial Incentive**. CA Consumers have the right to know the financial incentives, or a financial incentive program offered by data controllers. We do not offer any financial incentives or financial incentive programs to CA Consumers.

We may collect PII in the above categories described in Section 13 from CA Consumers themselves, from third parties, and by automatic means for the business purposes described in Section 13 above, and as required to comply with applicable law.

b. NOTICE TO COLORADO RESIDENTS

The Colorado Privacy Act applies to our practices with respect to the PII of Colorado residents (“**CO Consumer**”). In addition to the rights described in Section 13 above, under the Colorado Privacy Act, CO Consumers have certain rights regarding their PII:

- **Additional Information Regarding Your Right to Access**. As a CO Consumer, your Right to Access in Section 13 includes the right to have the data we provide you in satisfying your request be in the language in which you interact with us while using the Service.
- **Additional Information Regarding Your Right to Opt-Out**. As a CO Consumer, your Right to Opt-Out in Section 13 receives priority in our response to you seeking to exercise any of your Rights described within this Privacy Policy. We will respond your request to Opt-Out as soon as feasible and where you submit a request to exercise more than one of the rights described within this Privacy Policy, we will prioritize your request to exercise your right to Opt-Out above all others. We will maintain a record of your Out-Out request.

c. NOTICE TO CONNECTICUT RESIDENTS

The Connecticut Data Privacy Act applies to our practices with respect to the PII of Connecticut residents (“**CT Consumers**”). In addition to the rights described in Section 13 above, under the Connecticut Data Privacy Act, CT Consumers have certain rights regarding their PII.

- **Additional Information Regarding Your Right Delete**. As a CT Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

d. NOTICE TO DELAWARE RESIDENTS

The Delaware Personal Data Privacy Act applies to our practices with respect to the PII of Delaware residents (“**DE Consumer**”). In addition to the rights described in Section 13 above, under the Delaware Personal Data Privacy Act, DE Consumers have certain rights regarding their PII:

- Additional Information Regarding Your Right of Access. As a DE Consumer, you have the right to request the categories of third parties to which we have disclosed your PII.
- Additional Information Regarding Your Right Delete. As a DE Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

e. NOTICE TO INDIANA RESIDENTS

The Indiana Consumer Data Protection Act applies to our practices with respect to the PII of Indiana residents (“**IN Consumers**”). In addition to the rights described in Section 13 above, under the Indiana Consumer Data Protection Act, IN Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right Copy. As an IN Consumer, your Right to Copy in Section 13 includes, in the alternative, a right to request a representative summary of your PII that you have previously provided to us.

f. NOTICE TO MARYLAND RESIDENTS

The Maryland Online Data Privacy Act applies to our practices with respect to the PII of Maryland residents (“**MD Consumers**”). In addition to the rights described in Section 13 above, under the Maryland Online Data Privacy Act, MD Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right of Access. As an MD Consumer, you have the right to request the categories of third parties to which we have disclosed your, or any, PII.

IN THE PAST 12 MONTHS, WE HAVE NOT DISCLOSED, SOLD, OR SHARED PII AND WE DO NOT INTEND TO DO SO WHILE THIS VERSION OF THE PRIVACY POLICY IS EFFECTIVE.

- Additional Information Regarding Your Right Delete. As an MD Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

g. NOTICE TO NEBRASKA RESIDENTS

The NDPA applies to our practices with respect to the PII of Nebraska residents (“**NE Consumer**”). In addition to the rights described in Section 13 above, under the NDPA, NE Consumers have certain rights regarding their PII:

- Additional Information Regarding Your Right Delete. As an NE Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

h. NOTICE TO NEVADA RESIDENTS

If you are a Nevada resident, we do not “sell” PII as defined in the Nevada Privacy of Information Collected on the Internet from Consumers Act as amended by Nevada Revised Statutes Chapter 603A. Nonetheless, you may submit a request to prohibit such sales by contacting us at contact@hedera.com. Additional information on the categories of PII collected and categories of PII shared with third parties can be found in this Privacy Notice. If you would like to tell us not to sell your information in the future, please email us at contact@hedera.com with your name, postal address, telephone number, and email address with “Nevada Do Not Sell” in the subject line. For a list of the categories of information that we collect, please refer to Section 13.

i. NOTICE TO NEW HAMPSHIRE RESIDENTS

The New Hampshire Expectation of Privacy Act applies to our practices with respect to the PII of New Hampshire residents (“**NH Consumers**”). In addition to the rights described in Section 13 above, under the New Hampshire Expectation of Privacy Act, NH Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right Delete. As an NH Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

j. NOTICE TO OREGON RESIDENTS

The Oregon Consumer Privacy Act applies to our practices with respect to the PII of Oregon residents (“**OR Consumers**”). In addition to the rights described in Section XX above, under the Oregon Consumer Privacy Act, OR Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right of Access. As an OR Consumer, you have the right to request that we tell you the identity of the third parties (other than natural persons) to which we have disclosed your, or any, PII.

IN THE PAST 12 MONTHS, WE HAVE NOT DISCLOSED, SOLD, OR SHARED PII AND WE DO NOT INTEND TO DO SO WHILE THIS VERSION OF THE PRIVACY POLICY IS EFFECTIVE.

Additional Information Regarding Your Right Delete. As an OR Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of

your deletion request and any minimum data necessary to ensure that your PII remains deleted.

k. NOTICE TO RHODE ISLAND RESIDENTS

The Rhode Island Data Transparency and Privacy Protection Act applies to our practices with respect to the PII of Rhode Island residents (“**RI Consumers**”). In addition to the rights described in Section 13 above, under the Rhode Island Data Transparency and Privacy Protection Act, RI Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Rights to Correct and Delete. As an RI Consumer, your Rights to Correct and Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

l. NOTICE TO TENNESSEE RESIDENTS

The Tennessee Information Protection Act applies to our practices with respect to the PII of Tennessee residents (“**TN Consumers**”). In addition to the rights described in Section 13 above, under the Tennessee Information Protection Act, TN Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right of Access. As a TN Consumer, you have the right to request that we tell you the categories of your PII which we have sold, the categories of third parties to which we have sold your PII, and the categories of your PII that we have disclosed for a business purpose.

IN THE PAST 12 MONTHS, WE HAVE NOT DISCLOSED, SOLD, OR SHARED PII AND WE DO NOT INTEND TO DO SO WHILE THIS VERSION OF THE PRIVACY POLICY IS EFFECTIVE.

- Additional Information Regarding Your Right Delete. As an TN Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

m. NOTICE TO TEXAS RESIDENTS

The TDPSA applies to our practices with respect to the PII of Texas residents (“**TX Consumers**”). In addition to the rights described in Section 13 above, under the TDPSA, TX Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right Delete. As a TX Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

n. NOTICE TO UTAH RESIDENTS

The Utah Consumer Privacy Act applies to our practices with respect to the PII of Utah residents (“**UT Consumers**”). In addition to the rights described in Section 13 above, under the Utah Consumer Privacy Act, Utah Consumers have certain rights regarding their PII.

- Additional Information Regarding your Right to Opt In/Opt Out. We will not process your sensitive data without first obtaining your consent to do so. As a UT Consumer you are also be able to opt-out of targeted advertising based on your activity on non-affiliated websites and services. Please be aware, if you do exercise this right, you may still see generic ads on the Site and targeted ads based on your activity with Hedera.

o. NOTICE TO VIRGINIA RESIDENTS

The Virginia Consumer Data Protection Act applies to our practices with respect to the PII of Virginia residents (“**VA Consumers**”). In addition to the rights described in Section 13 above, under the Virginia Consumer Data Protection Act, VA Consumers have certain rights regarding their PII.

- Additional Information Regarding Your Right Delete. As a VA Consumer, your Right to Delete in Section 13 includes any PII that we hold about you which you have provided to us and that which we have obtained from any other source. We will maintain a record of your deletion request and any minimum data necessary to ensure that your PII remains deleted.

15. CHANGES TO OUR PRIVACY POLICY

We may, and we reserve the right to, modify or update this Privacy Policy from time to time to reflect the changes in our business and practices; as such, you should review this page periodically. If at any time in the future the manner in which we plan to use your data, or our general privacy practices, change(s) materially, we will update the ‘last modified’ date at the top of this page and notify you that material changes have been made to this Privacy Policy. Your continued use of the Service following our notice of changes to this Privacy Policy (or other method of legal acceptance) means you accept such changes. Please refer to the “Effective Date” above to see when this Policy was last update.

If you object to any changes, you may terminate your use of the Service.

16. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Service, please contact us at contact@hedera.com.

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