

# 1inch Developer Portal Privacy Policy

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This Privacy Policy is intended to inform you about the processing of your personal data when you access and/or use 1inch Developer Portal, [portal.1inch.dev](https://portal.1inch.dev) (“**1inch DevPortal**”, “**Website**”), a website operated by 1inch Limited, a BVI company registered at: c/o Walkers Corporate (BVI) Limited, 171 Main Street, PO Box 92, Road Town, Tortola VG1110, British Virgin Islands (“**1inch Limited**” or “**we**”). 1inch Limited acts as the data controller of the processing of your personal data within the scope of this Privacy Policy. It means that we decide “why” and “how” your personal data is processed in connection with the 1inch DevPortal. If you have additional questions or require more information about this Privacy Policy, do not hesitate to contact [info@1inch.dev](mailto:info@1inch.dev).

This Privacy Policy applies only to the interactions with the 1inch DevPortal, and is valid for participants who are visitors to the 1inch DevPortal with regards to the personal data that they share and/or which is collected within the 1inch DevPortal. This Privacy Policy is not applicable to any personal data collected offline or via channels other than the 1inch DevPortal. We advise you to carefully read this Privacy Policy to understand how we collect and process your personal data and for which purpose.

## 1. Changes to this Agreement

If our data processing practices change, we will update this Privacy Policy accordingly to let you know of them upfront and give you a possibility to either provide your consent, object to a particular processing, or undertake other action you are entitled to under the applicable regulation. Please keep track of any changes we may introduce to this Privacy Policy.

Your continued access to and use of the Website constitutes your awareness of all amendments made to this Privacy Policy as of the date of your accessing and use of the Website. Therefore, we encourage you to review this Privacy Policy regularly as you shall be bound by it.

## 2. Categories of Personal Data We Process

When you use the Website, the categories of personal data that we collect about you are the following:

### Personal Data You Provide When Using the Website:

- Any identification and contact data such as your email address, name, surname, and any other personal data you provide to us when signing up to 1inch DevPortal, creating your profile and/or requesting access to the 1inch Enterprise API;
- Any payment information that you may need to submit to process the payment for commercial use of 1inch API (e.g., billing information, your full name, billing address, bank account information or any additional information that may be required to facilitate the payment);
- Any personal data required to complete know your customer (KYC), know your business (KYB), and anti-money laundering (AML) compliance screening when accessing and/or using the 1inch Enterprise API;

- Any other personal data you provide directly to us when communicating with us.

#### **Personal Data Automatically Collected When You Use the Website:**

We use cookies, web beacons and similar tracking technologies to collect personal data from and store information on your device when you use, access, or otherwise interact with the Website. The categories of personal data that we may automatically collect are the following:

- Personal data collected by log files including internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks;
- Analytics and data related to your use of the Website (e.g., IP address, MAC address, log files, domain server, data related to usage, performance, website security, traffic patterns, location information);
- Behavioral data related to your use of the Website (including, in particular, and depending on the case, data related to your use of the Website and how you interact using the Website, content viewed, features accessed, your status on the Website, such as taps, clicks, scrolling data, etc.).

### **3. How and Why We Use Your Personal Data**

We may use your personal data listed above only for:

- Managing our contractual relationship with you and fulfill our contractual obligations when you use the Website;
- Assessing, analyzing and improving the performance of the Website;
- Analyzing the Website visitors' actions to improve the use of the Website (section "Cookies and Automatically Collected Data");
- Analyzing the Website behavior, including via: Google Analytics (please refer to [Google's Analytics' Policy](#) for more information);
- Providing support to you ,answering your queries, providing information and advice regarding the use of the 1inch DevPortal features and services;
- Sending marketing, promotional, informational emails.
- Identifying irregular website behavior, preventing fraudulent activity, and improving security of the Website;
- Complying with legal and regulatory obligations that may apply to us.

To clear any doubts, we may use personal data described above or any other personal data:

- On the basis of contract performance or necessity to enter into a contract (where the personal data is required for us to perform our undertakings and obligations in accordance with a contract we are entering into when you use the Website, or where we are at the negotiations phase);
- On the basis of our or our processors' legitimate interests to protect the Website, prevent any malicious and harmful activities to the Website, maintain our technical systems healthy and secure, improve services and products by using aggregate statistics;
- To ensure compliance with applicable regulations, our legal obligations, respond to legal requests of authorities, provide information upon court orders and judgments, or if we have a good-faith belief that such disclosure is necessary and abide the law in order to comply with official

investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders, and including other similar statutory obligations we or our processors are subjected to;

- On the basis of your consent; and
- On other legal bases set forth in the personal data protection laws.

#### **4. Sharing Your Personal Data**

In the context of processing your personal data in accordance with this Policy, we may communicate your personal data to the following recipients, if necessary:

- our subsidiaries or affiliates (if any) only if necessary for operational purposes.
- service providers, external suppliers, contractors, agents to the extent that they assist us in carrying out the purposes set out in this Privacy Policy (e.g., we use analytics providers to assist us in the improvement and optimization of the Website; marketing providers to promote the use of the Website; IT service providers and technical maintenance vendors to host your personal data and ensure proper functioning of the Website on our behalf, AML compliance and screening service providers to comply with AML laws, regulations and procedures);
- competent courts, public authorities, government agencies and law enforcement agencies to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to in response to subpoenas, search warrants, or court orders;
- third parties in connection with a merger, division, restructuring, change of control or bankruptcy or other association change.

We will only communicate your personal data to any recipient on a need-to-know basis and only when the processing by the recipient is strictly limited to the purposes identified in this Privacy Policy. We do not sell your personal data.

#### **5. Data Retention Period**

We maintain personal data exclusively within the time needed to follow prescribed herein legal purposes. When we no longer need personal data, the limitation period for storage of such personal data has expired, you have withdrawn your consent or objected to our or our processors' legitimate interests, we securely delete or destroy it unless the statutory requirements we, our processors or other controllers are subjected to stipulate otherwise. Aggregated data, which cannot directly identify a device/browser (or individual) and is used for purposes of reporting and analysis, is maintained for as long as commercially necessary till you object to processing of such data or withdraw your consent.

Sometimes legal requirements oblige us to retain certain data, for specific purposes, for an extended period of time. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention;
- Financial monitoring and record-keeping;
- Complying with legal or regulatory requirements;

- Ensuring the continuity of your interaction with the Website.

## 6. Transfer of Personal Data

As we operate globally, we may process your personal data around the world where our facilities or providers are located. Therefore, for the purpose of processing your personal data as described in this Policy, we may have to transfer your personal data outside the European Economic Area (“EEA”).

In these cases, we implement appropriate transfer mechanisms and safeguards to ensure that the personal data transferred benefit from the same level of protection within the EEA. In practice, this means that each of the envisaged transfers is based on at least one of the following mechanisms:

- the existence of an adequacy decision issued by the European Commission for the country to which your personal data is transferred; or, failing that;
- the conclusion of standard contractual clauses as adopted by the European Commission; or, failing that;
- the existence of an exemption linked to one of the specific situations exhaustively provided for by the General Data Protection Regulation n°2016/679 (“**GDPR**”). For example, where you have explicitly given your consent to the proposed transfer after having been informed of the absence of safeguards, where the transfer is necessary for the performance of a contract between you and us, where the transfer is necessary for the conclusion or performance of a contract concluded, in your interest, between us and a third party, or where the transfer is necessary for the establishment, exercise or defence of our legal claims, etc.

## 7. Cookies and Automatically Collected Data

As you navigate through and interact with the Website, we may ask your consent to use cookies, which are text files that can be stored on your devices when you visit an online service such as an application or a website to collect certain information about devices you use, browsing actions, and patterns. Cookies are used to store information on your device so that it can be accessed later.

The data automatically collected from cookies and similar tracking technologies may include information about your web browser (such as browser type and browser language) and details of your visits to the Website, including traffic data, location data and logs, page views, length of visit, and website navigation paths as well as information about your device and internet connection, including your IP address and how you interact with the Website. We collect this data in order to help us improve the Website and interaction with it.

The information we collect automatically may also include statistical and performance information arising from your use of the Website. This type of data will only be used by us in an aggregated and pseudonymized manner. You can choose to disable cookies through your individual browser options.

The settings for each browser are different. They are described in the help menu of your browser, which will enable you to know how to change your cookies preferences. For example:

- in Microsoft Edge please refer [here](#).
- in Safari please refer [here](#).
- in Chrome please refer [here](#).
- in Firefox please refer [here](#).
- in Opera please refer [here](#).

## 8. Your Rights

In accordance with the applicable personal data protection regulation, including the GDPR, you have the following rights: access, rectification, deletion, objection, restriction of processing, and data portability of your personal data.

Please note that some of these rights are subject to specific conditions set out in the applicable personal data protection regulation. Therefore, if your particular situation does not meet these conditions, we will unfortunately not be able to respond to your request. In this case, we will inform you of the reasons for our refusal.

- **Right of access** – You may request access to your personal data at any time. If you exercise your right of access, we will provide you with a copy of the personal data we hold about you as well as information relating to its processing.
- **Right of rectification** – You have the right to ask us to rectify or complete any personal data in our possession that you consider to be inaccurate or incomplete.
- **Right to erasure / to be forgotten** – You can ask us to delete your personal data if, for example, it is no longer necessary for the processing we carry out. We will use our best efforts to comply with your request. Please note, however, that we may have to retain some or all of your personal data if we are required to do so by applicable law or if the personal data is necessary for the establishment, exercise or defence of our rights.
- **Right to restriction of processing** – You may also request that we restrict the processing of your personal data on grounds relating to your particular situation. For example, if you dispute the accuracy of your personal data or object to the processing of your personal data, you may also request that we do not process your personal data for the time necessary to verify and investigate your claims.

In such cases, we will temporarily refrain from processing your personal data until necessary verifications have been made or until we comply with your requests.

- **Right to data portability** – You may request portability of the personal data you have provided us with. At your request, we will provide you with your personal data in a readable and structured format, so you can easily re-use it.

The portability of your personal data applies only to personal data that you have provided to us or that result from your activity on the Website, under the condition that the disclosure of your

personal data does not infringe the rights of third parties. If we are unable to comply with our request, we will inform you of the reasons for our refusal.

- **Right to object** - You may object at any time, on grounds relating to your particular situation, if we use your personal data. We will then stop processing of your personal data unless there are overriding legitimate grounds for continuing to process your personal data (for example, if your personal data is necessary for the establishment, exercise or defence of our rights or the rights of third parties in court proceedings). If we are unable to comply with your request to object, we will inform you of the reasons for our refusal. You can also object at any time to our processing of your personal data for commercial prospecting purposes.
- **Right to withdraw consent** – You have the right to withdraw consent at any time for processing of your personal data based on consent. Withdrawing your consent prevents us from processing your personal data but does not affect the lawfulness of the processing carried out before the withdrawal.

**Country Specific Rights:** You may also be granted specific rights as regards our processing of your personal data depending on the law applicable in the country you are residing in. You may contact us should you have any question in that regard.

## 9. How to Exercise Your Rights

If you wish to exercise your rights, you may contact us by using the contact information provided in Section 10 of this Policy (Contact Us). To be able to process your request efficiently, we may ask you additional information to confirm your identity and/or to help us retrieve the personal data related to your request.

Please note that you can lodge a complaint with a data protection regulator in one or more of the European Union member states. You can find a list of data protection authorities in Europe [here](#).

## 10. Contact Us

If you have any question regarding the processing of your personal data under this Policy, including the exercise of your rights as detailed above, you can contact us (i) by email at [info@1inch.dev](mailto:info@1inch.dev); or (ii) by post at the following address: 1inch Limited - c/o Walkers Corporate (BVI) Limited, 171 Main Street, PO Box 92, Road Town, Tortola VG1110, British Virgin Islands.