

# Data Protection Statement of Hilter

At Hilter, we recognize the paramount importance of protecting our users' personal data. As a technology company operating in the field of real estate tokenization and digital asset infrastructure, we are committed to the highest standards of privacy, security, and regulatory compliance.

## 1. Commitment to Global Data Protection Standards

Hilter's data protection framework complies with key international privacy regulations and industry best practices, including but not limited to:

General Data Protection Regulation (GDPR)

UK Data Protection Act (DPA 2018)

FATF AML/KYC Recommendations

SOC 2 Type II

PCI DSS

ISO 27001: Information Security Management

ISO 27017: Cloud Security Controls

ISO 9001: Quality Management

Certik Cybersecurity Audit

Certikit Cyber Essentials

These frameworks guide our internal protocols, third-party engagements, and platform-wide controls.

## 2. Secure Data Infrastructure

All user data is stored within secure, EU-based cloud infrastructure environments. Hilter uses advanced encryption technologies, access restrictions, firewalls, and security monitoring to protect against unauthorized access, alteration, or data loss. Access to Personal Data is granted strictly on a need-to-know basis and is limited to vetted personnel bound by confidentiality obligations.

## 3. Purpose-Limited Data Processing

We collect and process personal data only when necessary and solely for lawful, transparent, and specified purposes, including but not limited to:

User verification and KYC/AML compliance

Enabling secure transactions and wallet operations

Providing user support and communications

Legal and regulatory reporting

Risk mitigation and fraud prevention

For a full description of data uses, refer to our Privacy Policy.

#### 4. International Data Transfers

Hilter ensures that any transfer of personal data outside the European Economic Area is made in accordance with applicable data protection laws and is safeguarded by:

EU Commission Standard Contractual Clauses (SCCs)

Binding Corporate Rules (BCRs) where applicable

Hosting within regions deemed to have adequate levels of protection

User consent is sought where required by jurisdictional regulations.

#### 5. Data Retention and Blockchain Integrity

Hilter implements secure deletion protocols for off-chain data. However, data recorded on the blockchain (e.g., wallet activity or token ownership history) is immutable and cannot be removed or altered, in accordance with the decentralized nature of blockchain systems.

#### 6. User Rights

Depending on your location, you may have the right to:

Access, correct, or delete your personal data

Restrict or object to processing

Request data portability

Opt out of certain communications

We honor all lawful rights requests in accordance with GDPR and other regional regulations.

#### 7. Contact and Oversight

For any questions, data subject access requests, or complaints related to your personal data, please contact:

[support@hilter.com](mailto:support@hilter.com)

We treat all inquiries seriously and aim to respond within statutory deadlines.