

Privacy Policy

Last updated: June 16, 2025

Your privacy is important to us. Hilter Real Estate Technologies Ltd. (“Hilter”, “we”, or “us ”) wants you to be familiar with how we collect, use and disclose your Personal Information.

This Privacy Policy (“Policy”) explains how we collect, use, and disclose your Personal Information when you visit or use services made available through our websites (“Websites ”) and associated platforms operated by us from which you are accessing this Policy (collectively, the “Services”) including:

The Hilter network, through which you are able to access and interact with a foundational layer for regulated assets (“Hilter Blockchain”);

The Hilter Wallet through which you are able to manage your (i) digital assets;

This Policy also describes other important topics relating to your privacy.

Consent

By using the Services, or by otherwise choosing to submit Personal Information to Hilter, you consent to the collection, use and disclosure of your information as outlined in this Policy. At any time, you have the right to remove your consent to the collection, and future use and disclosure of your information, subject to reasonable notice and legal, contractual and technological limitations. You may make this request by writing to the e-mail address set out below.

Modifications

We may change this Policy from time to time. If we make material changes, we will take reasonable steps to notify you, such as by revising the effective date at the top of the Policy or placing a notice on our Websites and associated platforms through which you use our Services, or at our discretion, contacting you using any contact information you have provided. We encourage you to review the Policy whenever you access the Services to stay informed about our information practices.

Information that we Collect

Hilter may collect various categories of Personal Data when you access its Website, register on the Hilter Platform, utilize Hilter Services, or engage with the company through any communication channel or medium.

1. Information Provided Directly by You

This includes, but is not limited to:

- **Identity Data:** Your full name, date and place (or country) of birth, personal photograph or selfie, scanned copies or photos of identification documents (such as passport, national ID, or driver's license – both sides), email address, any declared official position or social status, and information regarding sanctions status.
- **Contact & Communication Data :** Permanent and current residential addresses , phone numbers , social media handles or profile information , and any messages exchanged via social networks or other communication platforms.
- **Employment Data:** Information about your profession, industry, and employment status.

- **Financial Data:** Bank account details, digital asset wallet addresses, source of funds or crypto assets, transaction records, and details of assets held within the Hilter Platform.

- **Other Voluntarily Provided Data:** Any other personal information you choose to share with Hilter.

2. Information Automatically Collected

When you use the Hilter Platform, certain data is collected automatically, including:

- **Technical Information:** Device specifications, network-related data, internet connectivity details, account access metadata, browser type and version, time zone settings, installed browser extensions, operating system and platform, screen resolution, geolocation data, and font rendering details.

- **Usage & Activity Data:** Complete visit logs (including URLs visited on or via the Hilter Platform, with timestamps), cookie and Terms acceptance, service interactions or searches, referring or exit pages, viewed files (e.g., HTML, graphics), page response times, loading errors, page access durations, user interactions (clicks, mouse movements), and exit paths. More information is available in our [Cookies Policy].

- **Service-Generated Information:** Data generated through your use of Hilter Services, such as asset holdings, account status, loyalty tier, transaction logs, activity history, IP logs, and location data.

3. Information from Third Parties

Hilter may obtain Personal Data about you from third-party sources strictly for purposes such as account setup, identity verification, and legal due diligence, in line with regulatory requirements.

Hilter does not seek or collect any other Personal Data from third parties beyond what is specified above. Please be aware that if you choose not to provide required information – especially when mandated by law or necessary for contractual obligations – we may be unable to initiate or continue offering certain services.

How do we Use your Personal Information?

Information we collect is used by Hilter and its service providers to:

- Provide you with the functionality of the Services and fulfil your requests, for example;

- Create your account and associated decentralized identity to enable you to access the Services;

- Create your Hilter Wallet to enable you to access the Services;

- Send you technical notices, updates, security alerts and support and administrative messages;

- Respond to your comments, questions and requests and provide you service;

- Communicate with you about products, services, and events we think will be of interest to you;

- To understand users and potential users and their interests in Hilter products and services, manage our relationship with users, enhance user experience on our platform and applications, improve our platforms and applications;

- Monitor and analyze trends, usage and activities in connection with our Services so that we can improve our Services;

- Conduct audits to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;
- Carry out any other purpose for which the information was collected and for which you have provided your consent; and
- For other purposes that are permitted or required by applicable law such as verifying your identity in accordance with our client identification requirements.
- We may aggregate and anonymize Personal Information so that it may not be used to identify you or any other individual. We do so to generate data for our use, which we may use and disclose for any purpose, if permitted by applicable law.
- Fraud prevention: we process your Personal Data to monitor and detect security incidents, to protect against malicious, deceptive, fraudulent or illegal activity, including money laundering, terrorism financing and other criminal activities and hold those responsible for that activity;

Security

Hilter uses physical, technological, and organizational security measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Hilter stores Personal Data collected via its Platform or other channels on secure servers located within a cloud infrastructure in the European Union. The company is certified under ISO 27001 and employs a range of security practices tailored to the nature of its services. These include appropriate administrative, technical, human, and physical safeguards designed to protect Personal Data from accidental loss, unauthorized access or use, alteration, or disclosure.

Technical security measures may include , but are not limited to , firewalls , encryption protocols, and other network protections.

Access to Personal Data is strictly limited to authorized personnel – such as employees , agents , contractors , or relevant third parties – who require such access for legitimate business or legal purposes . These individuals or entities operate strictly under Hilter 's instructions and are bound by confidentiality obligations . All personnel with access rights are thoroughly vetted, regularly re-evaluated, and required to uphold strict data confidentiality at all times.

However, while we have taken steps to help protect your Personal Information, we cannot fully eliminate security risks associated with Personal Information. No security measures can provide absolute protection. We cannot ensure or warrant the security of any information you provide to us.

Storage and Retention

The retention period of Personal Data varies depending on its category and intended use:

- Certain types of data may be automatically deleted according to predefined schedules or scripts, or upon your request. For instance, if you opt out of receiving marketing communications, your email address will be retained on a suppression list to ensure you are not contacted again for promotional purposes.

- Other categories of information – such as account-related data – may be stored for extended periods, in line with your contractual relationship with us, relevant industry standards, and our legitimate business interests. These interests may include, for example, the prevention of misuse or abuse of promotions and similar forms of activity.
- Some data may also be retained for internal business purposes aligned with our legitimate interests, including service and product enhancement, fraud detection and prevention, record-keeping, complaint handling, or the enforcement and defense of legal rights.
- Additionally, certain Personal Data must be retained in order to meet legal, audit, and regulatory obligations. These may include, but are not limited to, compliance with FATF (Financial Action Task Force) recommendations and applicable anti-money laundering laws, which require us to store relevant Personal Data for a minimum of five (5) years after the termination of our business relationship. In specific situations, this retention period may be extended if mandated by applicable law.

Your Rights

Your rights as a Data Subject may vary depending on your country of residence, citizenship, or the jurisdiction from which you access the Hilter Platform. Based on applicable privacy laws, including the General Data Protection Regulation (GDPR) and other regional legislation, you may be entitled to exercise one or more of the following rights.

Upon receiving your request through the contact details provided below, Hilter will respond without undue delay, and within legally established timeframes – generally within 30 days, with a possible extension of up to two additional months in accordance with Article 12 of the GDPR, unless otherwise specified by applicable data protection laws.

Your rights may include:

- Right of Access

You have the right to confirm whether your Personal Data is being processed, and, if so, to access related information – including the purpose of processing, types of Personal Data collected, recipients of the data, and applicable retention periods.

- Right to Rectification

You may request correction of any inaccurate Personal Data or completion of incomplete data.

- Right to Restrict Processing

In certain circumstances, you may request to limit the processing of your Personal Data.

- Right to Data Portability

You are entitled to:

- 1) receive your Personal Data in a structured, commonly used, and machine-readable format; and
- 2) request the transmission of your data to another data controller, where technically feasible.

- Right to Object to Processing

You have the right to object to the processing of your Personal Data for purposes such as profiling, direct marketing, or scientific, statistical, and historical research.

- Right to Object to Automated Decision-Making

You may object to decisions made solely through automated processing – including profiling – that produce legal or similarly significant effects on you.

To ensure the protection of your privacy, Hilter may take reasonable steps to verify your identity before fulfilling your request. While we will make every reasonable effort to investigate and comply with valid requests in accordance with applicable law, certain limitations may apply. For example, we may withhold access to information if it compromises the rights or identity of another individual.

Hilter also reserves the right to decline requests that are, in its sole judgment, manifestly unfounded, excessive, or otherwise non-compliant with relevant legal standards.

Please note: if your request concerns publicly available Personal Data, you must contact the third-party source that published such information.

Hilter does not charge any fees for processing your rights requests. However, a reasonable administrative fee may apply if the request is deemed to be clearly unfounded or excessive.

Contact us

We value your opinion, if you have any comments or questions about this Privacy Policy, Hilter's handling of your Personal Data, a possible Personal Data Breach, or to exercise your rights, please send an email to Hilter's Support Service. Hilter will treat your requests or complaints confidentially.

Hilter's Support Service: support@hilter.com.