



# Privacy Notice

## hVPN: Secure VPN by Hacken

Last update: **October 27, 2022**

**hVPN: Secure VPN by Hacken** cares about your personal data and does everything possible to protect it. This Privacy Notice is here to help you understand what your personal data is collected, stored and used, and what happens to it, when you use our [website](#) (“**Website**”), desktop application or mobile application (“**App**”).

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## Categories of data subjects

### In brief:

- *Using our Website or App and its functions you can be for us: Visitor, Unsubscribed Customer or Customer*

When you interact with our Website or App you become the **User**. As a User or in the process of receiving our services, you can become:

Category of data subject	Description
Website Visitor	Users, who leave only automatically collected data from the Website
Unsubscribed Customer	Users, who use App for free (without subscription)
Customer	Users, who buy Premium Subscription



## Contacts and Controller information

### In brief:

- We provide you with contact information

<b>Data controller</b>	Hacken OÜ
<b>Address</b>	Kai tn 1-5M, Tallinn city, Harju county, 10111, Estonia
<b>Email</b>	<a href="mailto:support@hacken.io">support@hacken.io</a>

## Personal data that we process

### In brief:

- The data we process is divided into categories: automatically collected data, data provided to us by Customers and data received from third parties;
- Third parties from whom we receive data are publicly available.

The data we process is divided into categories: automatically collected data, data provided to us by Unsubscribed Customers and Customers and data received from third parties.

- [automatically collected data \(Visitor data\);](#)
- [data provided to us by the Unsubscribed Customers;](#)
- [data provided to us by the Customers;](#)
- [data obtained from third parties.](#)

**Pay attention!** We do not knowingly process personal data of visitors under the age of 16 without consent from a legal representative(s). If you are such a visitor or the legal representative of the visitor, please let us know by email: [support@hacken.io](mailto:support@hacken.io).

We may process personal data on the following lawful basis:

- performance of the contract - the processing of personal data is necessary for the conclusion and performance of a contract. Failure to provide data that is processed on an "performance of the contract" basis will result in the inability to register and provide our services;
- consent - for additional processing for certain purposes.

Your data will not be processed for purposes other than those for which it was collected, as described in the tables below.



## Automatically collected data (Visitor data)

When you visit our Website, some data is automatically collected. This data primarily refers to the Visitor. Learn more about the purposes and basis for data processing:

When	Purpose	Lawful basis	Data
You agree to the use of cookies	Statistics and analytics	Consent	Statistical information that is generated when you use our Website.
You access the Website	Correct operation of the Website	Legitimate interest	IP address, UTM settings, geolocation, device type, browser type and other technical information
You use the App	General statistics and analytics for product development	Legitimate interest	Aggregated data about App usage

### Storage limitation

Data that are processed on the basis of a legitimate interest	Stored for up to 2 years after the last use of the Website
Data that is processed on the basis of your consent	Stored for up to 2 years from the last time you used the Website or until you withdraw your consent

## Data provided to us by the Unsubscribed Customers

When	Purpose	Lawful basis	Data
You use the App. Connect or disconnect.	Provide a service	Performance of a contract	<ul style="list-style-type: none"><li>Your IP address;</li><li>Your WiFi connection;</li><li>The server you decide to connect to.</li></ul>
You WiFi to the whitelist	Provide a service	Performance of a contract	<ul style="list-style-type: none"><li>Your WiFi connection</li></ul>

### Storage limitation

Data that is processed on the basis of performance of a contract	Stored until completion of services + 3 years
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You can exercise your right to delete your data. In this case, your data will be deleted from our servers within 30 days of your request.



## Data provided to us by the Customer

When	Purpose	Lawful basis	Data
You log in	Provide a service	Performance of a contract	<ul style="list-style-type: none"><li>• Email</li></ul>
You chose subscription plan	Provide a service	Performance of a contract	<ul style="list-style-type: none"><li>• Type of subscription</li><li>• payment id</li><li>• user ID</li><li>• cashback data</li></ul>
You use the App. Connect or disconnect.	Provide a service	Performance of a contract	<ul style="list-style-type: none"><li>• Your WiFi connection;</li><li>• Your IP address;</li><li>• The server you decide to connect to.</li></ul>

### Storage limitation

Data that is processed on the basis of performance of a contract

Stored until completion of services + 3 years

## Data obtained from third parties

Also, we can collect some data from third parties.

We share your data with the service providers who, for example, help us:

- operate, develop, and improve the features and functionality of our Website and App;
- handle payments;
- provide you with their services;
- communicate with you as described elsewhere in this Privacy Notice.

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

Third parties	Description	Link to privacy documents
Twitter	For communication and support	<a href="#">Privacy Policy</a>

**Note:** we can get data from third parties, but we won't necessarily get it. It all depends on your settings and the features you use. For example, we can receive data if you communicate with us through these third parties.

## Information on data transfer



In brief:

- *We have the ability to transfer and disclose your data legally;*
- *We use appropriate safeguards to transfer your data.*

## General

We may transfer your data with our employees and partners for contractual purposes. We we transfer your data on the following basis:

1. Consent. We transfer your personal data based on your explicit consent.
2. Compliance with the law. We will disclose your personal data to third parties to the extent that it is necessary:
  - to comply with a government request, court order, or applicable law;
  - to prevent unlawful use of our Website or violation of the Terms of Use of our Website and App and our policies;
  - to protect against claims of third parties;
  - to help prevent or investigate fraud.
3. Legitimate interest or performance of the contract. We transfer your personal data to third parties on the basis of a contract for processing on our behalf, subject to technical, physical and organizational measures to protect your personal data.

We may transfer:

- automatically collected data to contractors who provide us with marketing services;
- data we can get from other data subjects to contractors who provide us with customer relationship building services.

Our processors are located in the following countries: Portugal, Spain, Ukraine, USA, Estonia, Slovakia.

4. Business transfers. We will transfer your data between Hacken companies and between structural departments of Hacken. We will also transfer data to individual controllers in the context of service provision and to the extent strictly necessary to provide it.

**Note:** we will ask for your consent if the transfer of data is not part of a contract. If a transfer is necessary, we also undertake to obtain permission from the regulatory body.

## Data collection

The personal data that we collect is stored on servers in Estonia. If we need a data transfer, we will take necessary steps to protect it.

We will transfer your personal data outside the EEA to provide service with all appropriate safeguards to protect your personal data.



## Security

### In brief:

- We use technical, physical and organizational measures to protect your data.

Storing documents in separate data storage	Encryption	Provision of access to personal data only to authorized persons
Password Policy	Licensed antivirus software	Internet, email policies
Two-factor authentication	Backuping	Other security measures

## Cookies

### In brief:

- We use cookies;
- You can customize cookie tracking in your browsers.

We use cookies and similar tracking technologies (beacons, tags, and scripts) to track the activity on our website.

If you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

Statistics cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. We use Statistic cookies only, presented below.

Name	Purpose	Expiry
_ga	Registers a unique ID for the session. This is used to generate statistical data on how the visitor uses the website	2 years
_ga_#	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit	2 years

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device.

You can customize cookie tracking in your browsers. If you want to disable cookies, then you can find instructions for managing your browser settings at these links:

[Internet Explorer](#)

[Microsoft Edge](#)

[Chrome](#)

[Safari](#)

[Firefox](#)

[Opera](#)

[Vivaldi](#)

We use cookies necessary for the functioning of the Website.



## Data subjects rights

### In brief:

- *You have rights regarding your data.*

You, as a data subject, have the right to interact with your data directly or through a request to us. This section describes these rights and how you can exercise them:

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

**Note:** To exercise your rights [contact us](#).

If your request was not satisfied, you can file a complaint with the regulatory body – the Data Protection Inspectorate, at [info@aki.ee](mailto:info@aki.ee) or write a letter to 39 Tatari St., 10134 Tallinn.

## Update

This Privacy Notice and the relationships falling under its effect are regulated by the Regulation (EU) 2016/679 (“GDPR”).

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

If significant material changes are made that affect your privacy and confidentiality, we will notify you by email or display information on the Website and ask for your consent.