

Privacy Policy of Hitno.com

(Effective from October 28, 2024)

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At **HITNO.COM** (“we” or “us”), we recognize the importance of privacy and the protection of personal information.

hitno.com (“**Hitno.com**” or “**Platform**”) is a business-to-consumer (or “**B2C**”) platform that connects and facilitates sales and purchases between business sellers (“**Sellers**”) and consumers (“**Buyers**”).

This Privacy Policy establishes the methods of collection, use, and disclosure of information in connection with the operation of the Platform, including personal information about you, the users of the Platform, visitors, and representatives. This Privacy Policy also applies to the use of the Platform via your mobile device. Other Hitno.com services are governed by separate Privacy Policies; please refer to the respective Privacy Policy for those services.

Depending on your location, the following organizations are responsible for processing your personal data:

- **For users located in Mainland China:** The Hitno.com Platform is not intended for use by individuals located in Mainland China. The only exception is employees of partner companies, AliExpress and Alibaba, who are allowed to use the Platform for business purposes. Any other registration or use of the Platform within Mainland China is considered invalid and violates our Privacy Policy terms.
- **For users located in the United States:** The Hitno.com Platform is not intended for use by individuals located in the United States. We do not provide services or enter into agreements with users registered or located in the U.S. If you are in the U.S., you are prohibited from registering, accessing, or using the Hitno.com Platform. Any registration or use of the Platform from within the U.S. will be considered invalid and in violation of our Privacy Policy terms.
- **For users located in the Russian Federation:** The Hitno.com Platform is not intended for use by individuals located in the Russian Federation. We do not provide services or enter into agreements with users registered or located in Russia. If you are located in the Russian Federation, you are prohibited from registering, accessing, or using the Hitno.com Platform. Any registration or use of the Platform from within Russia will be considered invalid and in violation of our Privacy Policy terms.
- **For users located in South Korea:** The Hitno.com Platform is not intended for use by individuals located in South Korea. We do not provide services or enter into agreements with users registered or located in South Korea. If you are located in South Korea, you are prohibited from registering, accessing, or using the Hitno.com Platform. Any registration or use of the Platform from within South Korea will be considered invalid and in violation of our Privacy Policy terms.
- **For users located in Relevant Jurisdictions:** The Hitno.com Platform is not intended for use by individuals located in Relevant Jurisdictions. Relevant jurisdictions include Azerbaijan, Armenia, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Turkmenistan, Tajikistan, and Uzbekistan. We do not provide services or enter into agreements with users registered or located in these countries. If you are in any of the Relevant Jurisdictions, you are prohibited from registering, accessing, or using the Hitno.com Platform. Any registration or use of the Platform from within these Relevant Jurisdictions will be considered invalid and in violation of our Privacy Policy terms.
- **For users located in Brazil:** Users in Brazil enter into an agreement with HITNO MARKETPLACE PTE. LTD. (Company Number 202406813D, Registered Address: 68 Circular Road, #02-01, Singapore, 049422).

- **For users from other locations:** If you are a registered user of the Platform and located anywhere outside Mainland China, the United States, the Russian Federation, South Korea, and Relevant Jurisdictions, you enter into an agreement with HITNO MARKETPLACE PTE. LTD. (Company Number 202406813D, Registered Address: 68 Circular Road, #02-01, Singapore, 049422).

A: Collection of Personal Information

We collect personal information directly from you based on your interactions with us and our Platform, categorized as follows:

1. Information You Provide to Us

When you actively use our Platform as a Buyer or Seller, you provide certain personal details:

- Buyers provide:
 - Contact Information: Name, address, phone number, email.
 - Payment Information: Credit card or similar payment method details, billing, and shipping addresses.
 - Purchase Information: Details about purchased goods.
 - Complaint Information: Related to grievances regarding the Platform or purchased goods/services.
 - Identity Information: ID (e.g., passport) for after-sales services.
 - Correspondence Records: Communications with customer support (email, chat, etc.).
- Sellers (including sole traders or representatives of corporate Sellers) provide:
 - Business Information: Corporate registration, licenses, tax data.
 - Payment Information: Bank account or similar for receiving payments.
 - Product Information: Details of goods intended for sale.
 - Contact Information: Name, address, phone, email, etc.
 - Social Media: For bloggers/influencers, social media account and blog details.
 - Questionnaire Responses: Demographic data, e.g., nationality, marital status, etc., if voluntarily provided.
 - Correspondence Records: Customer support-related communications.

2. Information Collected Indirectly

Personal data is also collected automatically through your device during Platform use, some via cookies and tracking technologies. This includes:

- Platform Activity Information: Details on sold/purchased goods, pricing, delivery data, dispute records, and Buyer-Seller interactions.
- Platform Usage Data: IP address, access times, device data, browsing behavior, and interactions on the Platform.
- Inferred Information: Derived insights based on collected activity and usage data.
- Social Media Content: Posts/comments associated with the Platform, for certified influencers.
- Platform Contacts: Contact information if uploaded or imported.

3. Information Received from Third Parties

With your consent or as permitted by law, we may receive your data from third-party sources like social media or verification providers. This includes:

- **Social Media Profile Details:** Public information based on your privacy settings, such as username and profile picture.
- **Compliance Information:** Data necessary for anti-money laundering, fraud prevention, and identity verification (e.g., name, email, company details).

B. USE OF PERSONAL DATA

We collect and use your personal data for the following purposes:

- **Account Verification and Security Checks:** To verify Platform account registrations, including conducting fraud, security, "Know Your Customer" (KYC), and anti-money laundering (AML) checks for the approval of your Seller account.
- **Eligibility Verification:** To verify your eligibility to participate as a Platform blogger or influencer.
- **Account Setup and Administration:** For the setup and administration of Buyer and Seller accounts, including the provision of log-in credentials and the establishment of payment and transaction accounts.
- **Customer Support Services:** To provide customer service support, which includes responding to your inquiries, processing feedback, and managing claims or disputes.
- **Platform Services and Transaction Processing:** To facilitate general Platform services, enable communication between Buyers and Sellers, process transactions and payments, evaluate advance withdrawal requests from Sellers, and provide logistical and delivery services, including assistance to Sellers with logistics and delivery.
- **Clearance and Compliance Support:** To assist with Buyer and/or Seller clearance declarations or applications submitted through the Platform.
- **Membership Benefits:** To offer applicable membership benefits, such as birthday rewards, membership offers and coupons, anniversary awards, and exclusive member prices.
- **Identity and Purchase Verification:** To verify your identity and purchases in connection with product warranties or other after-sales claims.
- **Risk Assessment and Security Monitoring:** To assess and monitor account security and transaction risks for Buyers and Sellers, including the detection and prevention of fraud, money laundering, and other security incidents.

- **Personalized Marketing and Advertising:** To deliver tailored marketing and advertising content based on your interactions with the Platform, browsing history, and order history. This may involve the use of cookies and similar technologies to deliver advertising based on your browsing activities and interests. (Refer to Section F. COOKIES for additional information).
- **Research and Analytics:** To conduct research and data analytics aimed at enhancing Platform security, improving Platform content and layout, and refining our product offerings and services.
- **Social Connections:** To assist you in locating individuals you may know who are also using Hitno.com.

We may also use your personal data for other compatible purposes if permitted by applicable data protection laws. You may request further information regarding the compatibility of any additional purposes upon request.

C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION

We disclose/share personal information with the following categories of recipients:

- **Other Platform Buyers and/or Sellers** where necessary to support purchases and communications made between you. If you are a Buyer, Sellers that you purchase from will also control personal information about you relevant to or connected with your Platform purchases and communications with them. Please refer to Seller Privacy Policies for information about how they will process your information.
- **Third-party partners and service providers and/or affiliates** engaged by or working with us to assist us in providing services to you or who otherwise process personal information for purposes described in this Privacy Policy or notified to you when we collect your personal information. Categories of these partners and service providers include:
 - **Hitno.com entities and affiliated companies** and/or their designated service providers that work with us to provide processing services such as software, tools, systems, and messaging services for purposes described in this Privacy Policy;
 - **Our business partners** (for example, in order for them to provide you with discounts or offers that may interest Buyers or prospective Buyers) where you have consented to receiving such information from them, if required by applicable data protection laws;
 - **Marketing and advertising partners**, such as Google, Twitter, Facebook, and Instagram, and providers of analytics services relating to users' behavior (e.g., Appsflyer, Criteo) so that they may tailor the content you see when visiting our Platform for analytics and/or advertising purposes. These partners may combine

information they collect on our Platform with data on their platforms and data they collect from other websites or through other sources to conduct targeted advertising. The processing activities of these third-party marketing platforms are governed by their own privacy policies, not this Privacy Policy (please refer to section F "COOKIES" below);

- **Payment service providers** that provide payment processing services. The activities of payment service providers may be governed by their own privacy policies, not this Privacy Policy;
- **Credit risk assessment providers** to conduct risk assessment on Sellers to determine whether a Seller can be permitted to make an advance withdrawal;
- **Logistics partners** for providing delivery services for Buyers and Sellers, including return and exchange of products and warehousing services for Sellers;
- **Customs agents** for customs clearance purposes, where applicable, to support Buyers and Sellers with international sales/purchases;
- **Cloud computing or other hosting service providers** to provide cloud storage services;
- **Warranty service providers** to provide product warranty services where requested by a Buyer or Seller;
- **Customer service support providers** to provide after-sale services or other customer service support;
- **Risk control service providers** to assess the security of Buyer and Seller accounts and transaction risks; and
- **Third-party rating/reviewing service providers** to carry out reviews of our services with customers if you choose to participate in reviewing or rating Platform products and/or services.
- **To our professional advisers, law enforcement agencies, insurers, government and regulatory bodies**, and other organizations where we believe it is necessary to comply with applicable laws or to exercise, establish, or defend our legal rights or protect your vital interests or those of any other person, or as otherwise required or permitted by applicable laws.
- **To an actual or potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.
- **To any other person with your consent** to the disclosure.

We have established relationships with other parties and websites to offer you the benefit of products and services that we do not offer. We offer you access to these

other parties and their websites either through hyperlinks to these sites from our Platform or by offering “co-branded” sites in which both we and other parties share the same uniform resource locator (URL), domain name, or pages within a domain name on the Internet. In some cases, you may be required to submit personal information to register or apply for products or services provided by such third parties or co-branded partners. This Privacy Policy does not apply to these third-party sites or co-branded sites. The privacy policies of those other parties may differ from ours, and we have no control over the information you submit to those other sites. You should read the relevant privacy policy for those third-party sites and co-branded sites before responding to any offers, products, or services advertised by them.

D. DATA RETENTION

We will retain your personal information for as long as there exists a legitimate business need to do so, in order to provide you with our services or products, or as required or permitted by applicable law. When there is no longer a legitimate business need to process your personal information, we will either delete or anonymize it, or, if such options are not feasible (for instance, due to storage in backup archives), we will securely store your personal information and isolate it from any further processing until deletion becomes possible.

The retention period of your data may also depend on your usage of our website, such as whether you are logged in as a registered member or browsing as a guest, and on the purpose for which the information was provided. For instance, if you are a registered member, certain data may be retained for a specified period following the termination or deletion of your account to ensure compliance with applicable laws (e.g., in cases where a court order concerning your account necessitates extended retention) or to address disputes. In other cases, the retention period may be determined based on your activity on the Hitno.com platform or to meet specific arbitration periods or to resolve a dispute.

E. RIGHTS REGARDING PERSONAL DATA

Under applicable laws, you may have rights of access to personal information held by us and other rights. If you are a Visitor from the European Economic Area or the UK, please refer to section J. VISITORS FROM THE EUROPEAN ECONOMIC AREA or UK below for more information. If you are a Visitor from Brazil, please refer to section K. VISITORS FROM BRAZIL. If you are a Visitor from Mexico, please refer to section L. VISITORS FROM MEXICO. If you have any questions regarding this Privacy Policy or if you wish to access or correct your personal information as a user of Hitno.com, please [click here](#).

F. COOKIES

This section explains how we use cookies and similar technologies (collectively referred to as “cookies”) to recognize you when you visit our Platform. It explains what these technologies are, why we use them, and your rights to control them.

What are cookies?

A cookie is a string of information sent to your browser and stored on your computer's or mobile device's hard drive. If you do not deactivate or erase the cookie, each time you use the same browser or device to access the Platform, our web servers will be notified of your visit, and in turn, we may have knowledge of your visit and usage patterns.

Cookies set by the site or app owner (in this case, Hitno.com) are called "**first-party Cookies.**" Cookies set by third parties other than the site or app owner are called "**third-party Cookies.**" Third-party Cookies enable third-party features or functionalities to be provided on or through the website (e.g., advertising, interactive content, and analytics). These third-party entities can recognize your device when it visits the website in question and also when it visits certain other websites.

Cookies are also categorized as "**session Cookies**" (which are erased once you close the browser or shut down the device) and "**persistent Cookies**" (which remain even after closing the browser or shutting down the device/application and are activated each time you visit the Platform). Session cookies use encrypted data to authenticate you. Persistent Cookies do not store account numbers or passwords. We use both session and persistent cookies.

Why do we use Cookies?

We use first- and third-party Cookies for several reasons.

Some Cookies are required for technical and/or security reasons in order for our Platform to operate, and we refer to these as "essential" or "strictly necessary" Cookies. First-party Cookies are primarily used to enable basic functionality on our Platform, including web analytics Cookies that help us understand how users use our web pages and how we can improve them. For example, we use essential or strictly necessary Cookies to enable us to remember items added to your shopping basket and recognize you when you sign into your account.

We also use social media Cookies. You may register for Platform membership and "share" Platform content through social media such as Facebook and Twitter. Sometimes we embed videos from websites like YouTube. These websites have their own privacy policies governing their use of information, which you can find on the respective websites.

We also use Cookies to enable us to track and target the interests of Platform visitors, enhancing their experience by researching visiting patterns and conducting interest-based advertising; assisting our partners in tracking user visits to the Platform; and tracking progress and participation in promotions and the success of our email marketing campaigns. We use both first- and third-party Cookies for these purposes.

For more information about the Cookies we use, please see our [Cookie Notice](#).

G. MINORS

The Platform is designed solely for adult users, requiring individuals to be at least 18 years of age to access and use our Platform. We do not intend to offer or sell any of our products or services to minors, as defined by applicable laws. In the event that a minor has provided personal information without parental or guardian consent, the parent or guardian should contact us at info@hitno.com to request removal of the information.

H. SECURITY MEASURES

We implement appropriate technical and organizational measures to prevent unauthorized access to the Site, ensure data accuracy, and maintain the proper use of information we retain. In the event of a data breach, we will notify you and relevant regulatory authorities within the timeframe and scope required by applicable data protection laws.

For registered Platform users, certain information can be accessed and modified through your account, which is safeguarded by a password. You are responsible for maintaining the confidentiality and security of your password. We recommend that you do not disclose your password to anyone. Our personnel are instructed never to request your password. If you are using a shared or public computer, please avoid saving your log-in details (such as your user ID and password) on that device. Always remember to sign out of your account and close the browser window upon completing your session.

Please note that no data transmission over the internet or via any wireless network can be guaranteed to be completely secure. While we employ appropriate technical and organizational measures to protect your information, we cannot fully guarantee the security of data transmitted over the internet.

I. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically in response to legal, technical, or business developments.

When we revise this Privacy Policy, we will take appropriate steps to inform you in accordance with the significance of the changes and as required by applicable law, such as by posting an amended version of the Privacy Policy on the Platform.

J. VISITORS FROM THE EUROPEAN ECONOMIC AREA OR UK

This section applies if you are located in the European Economic Area (“**EEA**”) or the United Kingdom. The data controller of your personal information is HITNO MARKETPLACE PTE. LTD. (incorporated in Singapore with Company Reg. No. 202406813D). For contact details, please refer to Section O, HOW TO CONTACT US, below.

Additionally, if you are a Buyer, please note that Sellers on the Platform will also act as data controllers with respect to your personal information related to Platform purchases and any communications with them. Refer to the Privacy Policies of those Sellers for information on how they process such information.

Legal Basis for Data Processing

We process personal information for purposes outlined in this Privacy Policy. Our legal basis for processing your personal information depends on the nature of the personal information involved and the context in which we collect it, and will rely on one of the following legal grounds:

- **Contractual Necessity** – Certain personal data is required to provide the Platform to you under the contract between you and HITNO MARKETPLACE PTE. LTD. (for example, to deliver the services you request and to verify and authenticate your identity for Platform access);
- **Legal Obligation** – In some instances, we must process and retain your personal data as necessary to comply with legal requirements (for example, to meet applicable accounting standards or make mandatory disclosures to regulatory authorities);
- **Legitimate Interests** – We may use or disclose your personal data for the legitimate interests of HITNO MARKETPLACE PTE. LTD. or a third party, provided we are confident that your privacy rights remain appropriately safeguarded. When we rely on our (or a third party's) legitimate interests, these interests will typically relate to the operation of our Platform and services, managing our relationship with you, and necessary communications to provide services. This may include responding to inquiries, improving our Platform and services, conducting marketing activities, and ensuring the security of our Platform and services to prevent unlawful activities such as fraud. Other legitimate interests may be identified, and if so, we will inform you of them at the relevant time.
- **Consent** – In specific cases, we may request your consent (separately from any contractual agreement between us) before collecting, using, or disclosing your personal information. In such cases, you may freely choose to give or withhold your consent without any adverse impact on you.

If we require you to provide personal information to comply with a legal obligation or enter into a contract with you, we will notify you at the relevant time, clarifying whether the provision of your personal information is mandatory or voluntary (as well as the potential consequences of not providing it). In some cases, the provision of personal information may be necessary for us to offer all services and allow you to access all Platform features.

The table below provides additional information on the purposes for which we process your personal information and the applicable legal bases. The legal bases for processing your data will vary depending on the nature of the data and the specific context of its use.

Purpose of Processing	Type of Personal Information	Lawful Basis for Processing, Including Legitimate Interests
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To verify Platform account registrations, including fraud prevention, security, 'Know Your Customer' (KYC), and anti-money laundering checks for Seller account approval.	Compliance Information, Seller Business Information, Seller Contact Information	Compliance with legal obligations; Performance of a contractual obligation
To verify eligibility as a Platform blogger or influencer.	Social Media Information, Social Media Content, Social Media Profile Information	Performance of a contractual obligation
To establish and manage Buyer and Seller accounts, including log-in credentials and setting up payment/transaction accounts.	Buyer Contact Information, Buyer Payment Information, Purchase Information, Seller Business Information, Seller Payment Information, Product Information, Seller Contact Information, Social Media Profile Information	Performance of a contractual obligation
To provide customer service support, including responding to inquiries, feedback, and handling claims or disputes.	Complaint Information, Correspondence Information	Performance of a contractual obligation; Legitimate interests, such as safeguarding business interests in case of claims or non-contractual communications
To facilitate general Platform services, including communication facilitation between Buyers and Sellers, transaction/payment processing, Seller logistics support, and delivery services.	Buyer and Seller Contact and Payment Information, Purchase and Product Information, Correspondence Information, Platform Activity Information	Performance of a contractual obligation; Legitimate interests, such as Platform operation and non-contractual communication
To support Buyer and/or Seller customs clearance declarations.	Buyer and Seller Contact and Payment Information, Purchase and Product Information	Performance of a contractual obligation; Compliance with legal obligations; Legitimate interests, such as Platform operation and communication outside of contractual agreements
To provide membership benefits, such as birthday rewards, special offers, and member-exclusive prices.	Buyer Contact and Payment Information, Purchase Information	Consent, where required; Legitimate interests, such as Platform operation; Contract performance for related contractual agreements
To verify identity and purchases relevant to	Buyer Contact and Payment Information,	Performance of a contractual obligation; Compliance with legal

product warranties or after-sales claims.	Purchase Information, Identity Information	obligations where identity verification is required
To assess and monitor security and transaction risks to detect and prevent fraud, money laundering, and other security incidents.	Buyer and Seller Payment Information, Purchase and Product Information, Platform Activity and Compliance Information	Legitimate interests, such as Platform security and illegal activity prevention; Compliance with legal obligations
To provide tailored marketing and advertising based on usage, browsing history, and order records.	Buyer Contact Information, Purchase Information, Platform Activity and Usage Information, Derived Information	Consent, where required; Legitimate interests, such as marketing and promotion
To conduct research and analytics ensuring Platform security, layout improvements, and enhancement of offerings and services.	Questionnaire, Platform Activity and Usage Information, Product and Purchase Information	Consent, where required; Legitimate interests, such as Platform operation and improvements
To assist with identifying known users on the Platform.	Platform Contacts	Legitimate interests, such as Platform operation; Consent, where applicable

If you have questions or require further details regarding the legal basis on which we collect and use your personal information, please reach out to us using the contact information provided in Section O, "HOW TO CONTACT US," below.

You may contact us using the contact information provided in Section O, "HOW TO CONTACT US," to object to or withdraw consent for the processing of your personal information (including, but not limited to, its collection, use, disclosure, or sharing). However, doing so may restrict your ability to fully utilize the Platform.

Your Rights

- If you are a resident of the European Economic Area (EEA) or the United Kingdom (UK), you hold the following data protection rights, which you can exercise by contacting us through the details provided in Section O, "HOW TO CONTACT US," below:
- Right of Access: You have the right to request access to your personal information and to receive confirmation that your information is being processed.
- Right to Rectification: You may request corrections, updates, anonymization, blocking, or deletion of your personal information if you believe it to be inaccurate or outdated.
- Right to Object: You have the right to object to the processing of your personal information when the processing is based on our legitimate interests. This right allows you to stop the processing of your data if you do not agree with its legality.

- **Right to Restriction of Processing and Data Portability:** In certain situations, you may request temporary restrictions on the processing of your data (for instance, if the data needs to be verified for accuracy), or you may request the transfer (portability) of your information to another organization in a structured format.
- **Right to Opt-Out of Marketing Communications:** You can opt out of receiving marketing communications from us at any time by clicking the "unsubscribe" or "opt-out" link in our emails. To opt out of other forms of marketing (such as postal mail or telemarketing), please contact us using the details in Section O, "HOW TO CONTACT US."
- **Right to Withdraw Consent:** If your information was collected and processed with your consent, you have the right to withdraw this consent at any time. Withdrawing consent does not affect the legality of any processing carried out before the withdrawal, nor does it impact processing conducted on other lawful grounds.
- **Right to Review Automated Decisions:** You may request a review of decisions made solely through automated processing that may affect your rights and interests.
- **Right to Lodge a Complaint:** You have the right to file a complaint with a data protection authority regarding the collection and use of your information. In some cases, the supervisory authority may require that you first exhaust our internal complaint-handling procedures before considering your complaint.

We respond to all requests from individuals wishing to exercise their data protection rights in compliance with applicable data protection laws.

If you become aware of changes or inaccuracies in your information, please inform us promptly so that we may update or correct our records.

K. VISITORS FROM BRAZIL

This section applies if you are based in Brazil. The controller of personal data is HITNO MARKETPLACE PTE. LTD. (incorporated in Singapore with Company Registration No. 202406813D). Your data will be stored in Brazil. For contact details, please see section O. HOW TO CONTACT US below. Please also note, if you are a Buyer, Sellers will also act as data controllers of personal information related to your purchases and communications on the Platform. Please refer to the Privacy Policies of those Sellers for more information about how they will process such information. Personal data processing activities we perform on the Platform for the Brazilian market include any processing activity (i) carried out in Brazil, (ii) aimed at offering or providing goods or services or processing data of individuals located in Brazil, or (iii) collected in Brazil. All Platform activities for users in Brazil are carried out in accordance with Brazilian laws,

including the Marco Civil da Internet, Federal Law No. 12.965/2014 ("MCI"), and the General Data Protection Law, Federal Law No. 13.709/2018 ("LGPD").

We process the categories of personal information described in Section A of our Privacy Policy. Depending on the services you use, this may include your identifiers (e.g., IP addresses, date and time of access to the Platform, and email addresses), business and internet or other electronic network activity information, as well as inferences we may draw from other information we collect.

Legal Basis for Data Processing

We process personal information for the purposes set out in this Privacy Policy in accordance with the legal bases established in the LGPD. Our legal basis for processing your personal information depends on the nature of the information and the specific context in which we collect it. These bases include when processing is:

- necessary for the performance of the contract between you and HITNO MARKETPLACE PTE. LTD. (for example, to provide the services you requested and to identify and authenticate you so that you can use the Platform).
- necessary to comply with legal requirements (for example, to fulfill applicable accounting rules and make required disclosures to law enforcement authorities).
- necessary to achieve our legitimate interests or those of third parties.
- based on your consent.
- necessary for the regular exercise of rights in judicial, administrative, and arbitration proceedings.
- necessary for the protection of life and limb of the data subject or third parties.
- used for credit protection purposes.
- used in other cases as specified in the LGPD or applicable legislation.

If we process your personal information based on our (or a third party's) legitimate interest, that interest is typically to operate our Platform and services, manage our relationship with you, and communicate with you as necessary to provide our services. This legitimate interest may include responding to inquiries, improving our Platform and services, conducting marketing, ensuring the security of our Platform, and detecting or preventing illegal activities such as fraud. Other legitimate interests may apply, and we will clarify those at the relevant time if appropriate.

If we require you to provide personal information to comply with a legal requirement or to enter into a contract, we will clarify at that time whether it is mandatory to provide this information and any consequences of non-provision. In some cases, providing us with personal information may be necessary for us to deliver all services or for you to fully utilize Platform features.

For questions or further information regarding the legal basis on which we collect and process your personal information, please contact us using the details provided in section O. HOW TO CONTACT US below.

Your Rights

You have the following data protection rights, which you may exercise at any time by contacting us using the information provided in section O. ****HOW TO CONTACT US**** below:

- The right to access your personal data and confirm the existence of processing.
- The right to correct, update, anonymize, block, or delete your personal information.
- The right to object to the processing of your personal information based on our legitimate interests or in cases of non-compliance with LGPD or applicable law.
- The right to request, in certain situations, restrictions on the processing of your personal information or to request portability of your personal data.
- The right to unsubscribe from marketing communications at any time. You may exercise this right by clicking the "unsubscribe" link in our marketing emails. To unsubscribe from other marketing (such as postal marketing or telemarketing), please contact us using the information provided in section O. **HOW TO CONTACT US** below.
- If we process your personal information based on your consent, you have the right to withdraw consent at any time and request deletion of your personal data. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal, nor does it affect processing on other legal bases.
- The right to request a review of decisions based solely on automated processing that may affect your interests.
- The right to petition the National Data Protection Authority (ANPD) regarding our collection and use of your personal information.
- The right to request the portability of your personal data to another service provider.
- The right to request information about entities with whom your personal data has been shared.

We respond to all requests we receive from individuals exercising their data protection rights in accordance with applicable data protection laws. If you are aware of any changes or inaccuracies in your information, please notify us so we can update or correct our records.

To exercise your rights, you or your authorized legal representative may contact us using the details provided in section O. **HOW TO CONTACT US** below. Once we receive your request, we may verify it by requesting information to confirm your identity, including information regarding your Platform use.

L. VISITORS FROM MEXICO

This section applies if you are based in Mexico. The data controller of your personal information is HITNO MARKETPLACE PTE. LTD. (incorporated in Singapore with Company Registration No. 202406813D), located at 68 Circular Road, #02-01, Singapore, 049422. For contact details, please see section O. **HOW TO CONTACT US** below. Please also note that, if you are a Buyer, Sellers will also act as data controllers of personal information regarding your Platform purchases and communications with

them. Please refer to the Privacy Policies of those Sellers for more information about how they will process such information.

Legal Basis for Data Processing

Your consent is the basis for Hitno.com to process your personal data unless the processing is required by law. In that case, your consent would not be required.

Use of Personal Data

Except for “Sending and serving tailored marketing and advertising that we believe will be of interest to you” and “Help you find people you may know who are also using Hitno.com,” which are secondary purposes, the remaining processing purposes listed above in Section B. USE OF PERSONAL DATA are considered primary purposes.

If you do not want your personal data to be processed for secondary purposes and you do not want to receive our marketing and advertising communications, please click on the “unsubscribe” or “opt-out” link in the marketing emails we send you. You can also opt-out from those communications in the Settings section of the Platform.

Disclosure or Sharing of Personal Information

Your consent is required to transfer your personal data to “our business partners” and to any “actual or potential buyer” as mentioned above in Section C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION of this Privacy Policy. By consenting to this Privacy Policy, you agree to the data transfers outlined in this paragraph.

Hitno.com does not require your consent to disclose or share your personal information with the other recipients mentioned in Section C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION of this Privacy Policy.

Your Rights

You have the following rights regarding your personal information: i) access; ii) rectification; iii) cancellation; iv) objection; v) revocation of your consent; vi) limiting the use or disclosure of your personal information.

If you wish to exercise any of the above-mentioned rights, please contact us using the contact details provided under section O. HOW TO CONTACT US below. Your request must include: (i) Hitno.com account ID or registration email or phone number; and (ii) a description of the personal data related to the requested exercise of rights. We verify your identity when you access our services by logging into our services or through the email address registered in your account. Data subject requests sent by email must come from the email registered in your account to allow us to verify your identity.

We will respond to any complete request within 20 days. The response will indicate whether the request is admissible. If it is admissible, we will make the determination within 15 days from the date you communicate the response. Deadlines may be extended in accordance with the applicable law. If you exercise your right of access, we will provide digital documents.

M. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In connection with providing services through our Platform, we will store your personal data processed through the Platform in Brazil and Germany, depending on the country you are located in, primarily for backup and data center storage purposes. These countries have data protection laws that may differ from the laws of your country. International transfers of your information will also occur between the aforementioned countries. Where these transfers are not subject to an adequacy decision or regulations, we take appropriate steps to ensure that recipients of your personal information are bound by confidentiality obligations, and we implement necessary measures to safeguard your personal information in accordance with this Privacy Policy and applicable laws. For transfers involving both our group companies and third-party service providers handling personal information originating from the EEA and UK, we utilize the European Commission's Standard Contractual Clauses and, where relevant, the UK Addendum. A copy of the relevant clauses can be obtained by contacting us using the information provided in section O. HOW TO CONTACT US below.

N. LANGUAGE

If there is any conflict between the English version and another language version of this Privacy Policy, the English version shall prevail.

O. HOW TO CONTACT US

For data subject rights, please click [here](#).
Contact information info@hitno.com.