

Privacy Policy

(Effective Date: May 1, 2021)

This Privacy Policy (“Privacy Policy”) explains 2HPM’s, (“2HPM,” “we” “us” or “our”) privacy practices relating to the collection and use of information that may identify you and covers information collected from any source including, for example, through its websites (collectively, the “Site”), and any smartphone, device or other electronic applications or tools, through any social media platform (together, the “Electronic Platforms”), emails, text messages, direct messages, or other communications whether electronic or written, or from any third party such as a contractor acting on 2HPM’s behalf (all of the above is referred to collectively as the “Resources”).

It is 2HPM’s policy to respect your privacy regarding any information we may collect, subject to the provisions of this Privacy Policy and, if you receive services from 2HPM, the Host Agreement (“Host Agreement”) or any other agreements between you and 2HPM (together, “Terms of Use”), as any of the above may be amended from time to time. In addition, various Resources of 2HPM may include different terms or policies, and you should review any such terms and policies carefully, as they will control your use of that Resource. This Privacy Policy is incorporated into, and is a part of, the Host Agreement and any other Terms of Use. Capitalized terms not defined in this Privacy Policy have the meanings ascribed to them in the Host Agreement. By providing us any information or accessing one or more Resources, you agree to the following provisions as final and binding.

If you do not agree to the provisions of this Privacy Policy, including having your Personal Information (as defined below) used in any of the ways described in this Privacy Policy, do not provide us with your information. Please note, however, that if you don’t provide us with your information, you may not be able to obtain certain Services described in the Host Agreement or features of our Site.

2HPM may update this Privacy Policy from time-to-time in our sole discretion by posting such revised Privacy Policy on the Site. Please note the Effective Date of this Privacy Policy at the top of the page. It is your responsibility to review this Privacy Policy regularly for any changes each time that you use the Site and/or the Services or provide us information. Use of the Site or the Services by you following our posting of a new Privacy Policy on our Site constitutes your acceptance of the Privacy Policy as modified and will apply to all information received after the

Effective Date of the modification. In the event we materially change the way in which we use your Personal Information that we previously collected, we will provide you with notice and ask you to affirmatively accept the new uses.

This Privacy Policy applies to the processing of personal data of individuals wherever located including those in the European Union. If you are located in the European Union, if the processing of your data is subject to the laws of a member state of the European Union by virtue of public international law, if your information is otherwise governed by European Union Law, or if the processing activities of 2HPM are related to the offering of goods or services to data subjects in the European Union or the monitoring of individuals' behavior that takes place within the European Union, please review carefully the "General Data Protection Regulation ("GDPR")" section below for more information regarding your rights and our activities relating to your personal data. If you are a resident of California, please review the "California Residents' Privacy Rights" and the "Rights under the California Consumer Privacy Act" sections below for additional information regarding your rights and our activities relating to your personal data. If the GDPR or California sections are applicable to your information, then other sections in this Privacy Policy still may apply to you but are subject to (and considered modified by) those sections.

Collection and Use of Your Personal Information

We require Site visitors who register an Account to provide us certain Personal Information. Information we collect when you register to use our Services may include your name, phone number, email address, physical address, and the public key to Your Wallet as well as, potentially, other information that identifies you or that, in combination with other information we hold, may reasonably be used to identify you (together, "Personal Information").

We also may use the Personal Information you provide when you visit our Sites, create an Account, or email or otherwise contact us, to contact you to further discuss the product offerings and Services we provide to customers. You may choose to opt out of providing your Personal Information by not disclosing it to us or entering it when asked, though this may preclude your ability to receive our Services.

Processing Purposes

2HPM processes the following types of Personal Information for the following lawful purposes and based upon the legal justification set forth in the parenthetical:

- Your submission of Account Information (CONSENT)
- Processing Personal Information in order to fulfill an order or provide Services (CONSENT, CONTRACT, LEGAL OBLIGATION)
- Processing and providing identification information to governmental entities for tax or other legal purposes (LEGAL OBLIGATION)
- Your submission of Personal Information when contacting us for customer service, to provide feedback or for other purposes not otherwise described here (CONSENT)
- Your submission of Personal Data to our third party vendors for Services (CONSENT, CONTRACT)
- Collection of Personal Information through the Site (CONSENT)
- Collection of resumes, employment applications or other information relating to employment (CONSENT, CONTRACT)
- Payment (CONTRACT)
- Other information you voluntarily provide (CONSENT)

Legal Basis for Processing

We process your Personal Information with your consent, in order to perform a contract to which you are a party or, alternatively, in order to take steps at your request to enter into an agreement, and/or to comply with applicable law such as reporting of payments to independent contractors to tax authorities. To the extent that use of your information is based on your consent, you may withdraw your consent at any time. Use of information based on a contract will usually last for as long as the contract is in place, and for a period thereafter in order to comply with applicable law or fulfill our obligations, protect our rights or undertake internal operations.

Categories of Personal Information:

Generally, we collect, or may collect, the following data elements from you when we process your Personal Information for the purposes we described in this Privacy Policy. We process:

- Your first and last name
- Email address
- Phone
- Physical address
- Country of residence or business
- Public key to Your Wallet to send HNT
- Internet or other electronic network activity.
- General operational purposes or to verify identity, or if we offer new products or services, and depending on the reason for your contacting us, we may also collect additional information such as:
 - Date of birth
 - Partial credit card information as part of a tokenized payment transaction
 - Testimonials and other information you voluntarily provide.

Disclosures and Transfers of Personal Information

We do not share with or disclose Personal Information to third parties except when one or more of the following conditions is true:

- We have your permission to make the disclosure;
- The disclosure is necessary for the purpose for which the Personal Information was obtained, e.g., to file a tax form such as a Form 1099 or to provide to a third party such as a financial institution;
- The disclosure is permitted by relevant law
- The Personal Information to be disclosed is otherwise publicly available in accordance with applicable law;
- The disclosure is reasonably related to the sale or other disposition of all or part of our business or assets;
- The disclosure is for our own marketing purposes, or for the marketing purposes of third parties;

- The party to whom the disclosure is made controls, is controlled by, or is under common control with 2HPM;
- The disclosure is in our sole discretion necessary for the establishment or maintenance of legal claims or legal compliance, to satisfy any law, regulation, subpoena or government request, or in connection with litigation;
- The disclosure is, in our sole discretion, about users who we believe are engaged in illegal activities or are otherwise in violation of our Terms of Use, even without a subpoena, warrant or court order; or
- The disclosure is to outside businesses to perform certain services for us, such as maintaining our Site, processing of payments, assisting us in the provision of Services, providing marketing assistance and data analysis including service providers outside the country or jurisdiction in which you reside.

Delivering Advertising

We and our service providers may use information about your interactions with our Site to predict your interests and select the ads you see on and off our Site. This is known as interest-based advertising.

Communications Opt-Out

You may opt out of receiving marketing materials from us at any time by sending an email requesting such opt out to support@2HPM.io or by clicking the “unsubscribe” or similar link in any marketing email. Even after such opt-out, you may receive additional emails for a short period of time while we process your request. We also may contact you by email or otherwise with information that is not primarily marketing, for example, regarding updates to the Services or information about your Account or any contracts or arrangements. If, at any time after registering your information or electing to sign up for the Services, you change your mind about receiving information from us, send us a request specifying your new choice. Simply send your request to support@2HPM.io

California Residents' Privacy Rights

This section is applicable to residents of California. If you are a resident of California, you have certain rights described below. The following do not apply to individuals who do not live in California on a permanent basis.

- RIGHTS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83

A California resident who has provided personal data to a business with whom he/she has established a business relationship for personal, family, or household purposes (a "California Customer") may request information about whether the business has disclosed personal information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of personal data, upon receipt of a request by a California Customer, the business is required to provide a list of all third parties to whom personal data was disclosed in the preceding calendar year, as well as a list of the categories of personal data that were disclosed. California Customers may request further information about our compliance with this law by mailing us at 127 Lopez LN, Poplar Grove, IL 61065 or emailing us at support@2HPM.io. Please note that we are only required to respond to two requests per California Customer each year under Code Section 1798.83.

Rights Under the California Consumer Privacy Act

The above rights are separate from rights that California residents may have under the California Consumer Privacy Act ("CCPA"). At this time, 2HPM is not subject to the CCPA as a "business" (as defined in the statute). Nonetheless, we respect the privacy and wishes of individuals regarding their privacy. As such, you may make a request regarding our use, handling and protection of your Personal Information by emailing us at support@2HPM.io.

General Data Protection Regulations (“GDPR”)

In the event that we collect Personal Data (as defined in the GDPR) that is subject to the GDPR, this section will apply. Terms in this section are to be understood in a manner consistent with GDPR including the definitions of such terms in the GDPR. Such terms may have a different definition or meaning in other portions of this Privacy Policy because GDPR may not apply to those sections.

Identification of Data Controller:

The Data Controller is 2HPM. You may contact the 2HPM support@2HPM.io. Monday through Friday 9 am to 5 pm Eastern time.

Identification of Data Protection Officer and Contact Details

The Data Protection Officer is managed by Julian Chapman, who can be reached at support@2HPM.io

Identification of Primary Member State Supervisory/Data Protection Authority

You have the right to lodge a complaint regarding the processing of your Personal Data with us by contacting our Data Protection Officer listed above. You also may lodge a complaint with the Data Protection Authorities in the Member State where you habitually reside, work, or where an infringement occurred.

Processing Purposes and Legal Bases:

2HPM processes your Personal Data for the lawful purposes, and under the legal bases, set forth above.

Onward Transfer:

2HPM will not disclose Personal Data to a third party except as stated below:

We may disclose Personal Data to subcontractors and third-party agents. Before disclosing Personal Data to a subcontractor or third-party agent, we will obtain assurances by contractual agreement from the recipient that it will: (i) transfer such data only for limited and specified purposes; (ii) ascertain that the subcontractor or third-party agent is obligated to provide at least the same level of privacy protection as is required by the GDPR; (iii) take reasonable and appropriate steps to ensure that subcontractors and third-party agents effectively process the personal information transferred in a manner consistent with the

organization's obligations under the GDPR; (iv) require subcontractors and third-party agents to notify the organization if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the GDPR; (v) upon notice, including under (iv), take reasonable and appropriate steps to stop and remediate unauthorized processing; and (vi) provide a summary or a representative copy of the relevant privacy provisions of its contract with subcontractors and third-party agents to the Supervisory Authorities upon request.

2HPM also may be required to disclose, and may disclose, Personal Data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements, or in the event of a merger or acquisition.

Retention of Personal Data:

Personal Data obtained by 2HPM is adequate, relevant and not excessive in relation to the purposes described in this Privacy Policy. The Personal Data is processed for purposes specified herein and will only be processed consistent with the purposes described herein. We will request only the minimum amount of information required to perform the applicable Services and/or to comply with legal requirements and will retain such information only for as long as necessary to provide the Services or for compatible purposes, such as to provide additional Services, to comply with legal requirements, or to preserve or defend our legal rights.

Right of Access to your Personal Data

Data Subjects have the right to access the Personal Data an organization holds about them. If such Personal Data is inaccurate or processed in violation of the GDPR, a Data Subject also may request that Personal Data be corrected, amended, or deleted. When we receive Personal Data, we do so on behalf of the individual submitting such Personal Data. To request access to, or correction, amendment or deletion of, Personal Data, Data Subjects should contact our Data Protection Officer. We will cooperate with all reasonable requests to assist Data Subjects to exercise their rights under the GDPR.

Choice

Data Subjects have the right to opt out of (a) disclosures of their Personal Data to third parties not identified at the time of collection or subsequently authorized, and (b) uses of Personal Data for purposes materially different from those disclosed at the time of collection or subsequently authorized. Data Subjects who

wish to limit the use or disclosure of their Personal Data should submit that request to our Data Protection Officer. We will cooperate with Data Subjects' valid instructions regarding Data Subjects' choices.

Security:

See "Confidentiality and Security" below for more information about our security practices.

Transfers to the United States from the European Union:

In using the Site, your Personal Data will be transferred to the United States, which is not recognized as a country having adequate safeguards for the protection of Personal Data. 2HPM may rely on Article 49 of the GDPR for transfers of data collected from Data Subjects in the EU and EEA. Transfers may be made to 2HPM if the Data Subject has explicitly consented to the proposed transfer after having been informed of the possible risks of such transfers. Additionally, we transfer data as necessary for the performance of a contract between you as the Data Subject and 2HPM as the Controller, to data processors who have an agreement with us that includes protecting your privacy and the security of your data, and in cases where your Personal Data is necessary for the implementation of pre-contractual measures taken in accordance with your requests.

Do-Not-Track and Use of Cookies

Like many other websites, we and our partners use cookies (a small, removable data file that is stored by the web browser on your computer that identifies your computer and browser when you visit our Site or use our Services) and various technologies to collect and store information when you visit our Site or use a Service, and this may include sending one or more cookies or anonymous identifiers to your device. We also use cookies and anonymous identifiers when you interact with Services we offer to our partners. Please read the Cookie Policy below for more information.

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity while you are using our Site and may track which website you visit immediately before or after accessing the Site.

Third-Party Sites

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or websites that may be displayed to you in search results, websites that may include 2HPM Services, or other websites linked from our Site. This Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Correcting & Updating Your Information

To update your information or discontinue Services, email support@2HPM.io. 2HPM will respond to your correction or update request. You also may be able to update your information by logging into your Account.

Confidentiality and Security

We maintain reasonable safeguards to protect the Personal Information we collect. While we implement these measures, please note that 100% security is not possible, and we cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

You play a role in protecting your information as well. For example, 2HPM may assign you a user ID and a password as part of your participation and access to the Site and your Account. Only you may use your user ID and password. You may not share your user ID or password with anyone else, and you are solely responsible for maintaining and protecting the confidentiality of your user ID and password. It is strongly recommended that you change your password at regular intervals. We recommend that this interval be at least once per quarter, or as frequently as you deem appropriate. You are fully responsible for all activities that occur under your user ID even if undertaken by someone else. You are also responsible for assuring the security of Your Wallet, your email address and any other address you provide to us, and 2HPM is not responsible for any loss arising from loss of any such security or for any unauthorized access to your accounts.

Social Media Platforms and Websites

Any information, communications, or material of any type or nature that you submit to any public areas of the Site, if any (e.g., any pages that display comments) or third-party websites (including, but not limited to, any 2HPM-related or -controlled pages contained on a social media platform, application or website such as Facebook or Twitter) by email, posting, messaging, uploading, downloading, or otherwise (collectively, a “Submission”), is done at your own risk and without any expectation of privacy. 2HPM cannot control the actions of other users of any social media platform or website and we are therefore not responsible for any content or Submissions contained on such sites and platforms or public areas of our Site.

Visiting our Site from Outside of the United States

Your information may be transferred to, and maintained on, computers located outside of your state, province/territory, or country where the privacy laws may not be as protective as those where you live. If you are located outside the United States and choose to provide information to us, please be aware that we transfer your Personal Information to the United States and process and store it there. As a result, this information may be subject to access requests from governments, courts, law enforcement officials and national security authorities in the United States according to its laws. Subject to the applicable laws, we will use reasonable efforts to ensure that appropriate protections are in place to maintain protections on the Personal Information. By submitting your Personal Information, you consent to having your personal data transferred to, processed, and stored in the United States.

Business Transfers

If we or any of our affiliates is involved in a merger, acquisition, asset sale, joint venture or other, similar transaction, we will continue to ensure the confidentiality of any Personal Information. We may transfer or allow access to

Personal Information as part of the transaction and in review or preparation for it as described below.

In the event that:

- We engage in one more asset sales or purchases;
- We are acquired;
- We engage in one or more business combinations, mergers or acquisitions;
- Substantially all of our assets are acquired; or
- We are subject to an event of bankruptcy

you acknowledge and agree that personal and other information comprises an asset of ours and that Personal Information and other information is subject to assignment, transfer and/or acquisition by a third party. Accordingly, and notwithstanding anything to the contrary in this Privacy Policy, you acknowledge and agree that such transfers may occur and that a person or entity that acquires us may continue to subsequently use your Personal Information, and that such subsequent use may not be consistent with this Privacy Policy.

Children's Privacy

We do not knowingly collect or solicit personal information from children under the age of 18. By using the Site or Services, you represent that you are at least 18 years old. If you are under 18, please do not attempt to register for an Account or send any Personal Information about yourself to us. If we become aware that we have inadvertently received or collected Personal Information from a user of the Site who is under the age of 18, we will attempt to immediately delete that information from our files and records. Furthermore, we encourage users of the Site that are minors under 18 years of age to ask their parents or guardians for permission before sending any information about themselves over the Internet.

If you believe a child who is under the age of 18 has provided us with Personal Information, please contact us at the address listed above.

How to Contact Us

If you have any queries concerning your personal information or any questions on our use of that information, please contact us as noted below or as otherwise advised on the Sites or other Services:

Support@2HPM.io