

## **Privacy Policy**

### **Introduction**

House Party Labs Limited ("Company", "we", "our", "us") is committed to protecting the personal information provided by users in the course of using its services. This Privacy Policy is made readily accessible within the website so that users can easily understand how their personal information is processed and for what purposes.

This Privacy Policy serves the following key functions:

- (a) It informs users about the collection, use, sharing, entrustment, and destruction of their personal information.
- (b) It outlines users' legal rights, including the right to informational self-determination, and explains how such rights may be exercised.
- (c) It helps prevent the infringement of personal information and provides guidance on how to respond in the event of a data breach.

This Privacy Policy applies in connection with:

- (a) Your use of our website
- (b) Your use of our newsletter
- (c) Your use of our products and services
- (d) Your participation in events and programs organized by the Company

### **1. Purpose of collection and use of personal information**

Personal information shall not be used for purposes other than those specified below. If the purpose of use changes, the Company shall obtain separate and explicit consent from the user.

#### **1.1. Service Communication**

The Company processes personal information to provide users with updates regarding its services and developments, including newsletters, feature releases, and other announcements; and to share promotional or marketing content, only where the user has explicitly consented to receive such communications.

#### **1.2. Customer Support**

The Company may contact users for investigation purposes and to deliver relevant responses to their inquiries or requests.

#### **1.3. Legal Compliance**

The Company may provide personal information where required by law or upon lawful request from regulatory or investigative authorities, in accordance with applicable procedures.

#### **1.4. Website Analysis and Improvement**

The Company may use information to analyze website usage (including statistical analysis) for its legitimate interests, such as improving service performance, enhancing user experience, and assessing key interests and needs of users.

#### **1.5. Contract Performance**

Processing necessary for entering and maintaining contracts with users, including terms and conditions of website use.

## **1.6. Defense of Legal Claims**

Defending and asserting claims arising from contracts concluded with users.

## **2. Collection of Personal Information and Retention Period**

### **2.1. Items Collected**

Basic Information

Automatically Collected Website Information:

Our website automatically collects and stores the following information in log files:

- (a) IP addresses
- (b) The region or general location where your computer or device is accessing the internet
- (c) Preferred language used to display the website
- (d) Device screen resolution
- (e) Device type, browser type and operating system
- (f) Mouse events (movements, locations and clicks)
- (g) Referring URL and domain
- (h) Key-presses
- (i) Date and time when the page was accessed
- (j) Pages visited

### **2.2. Method of Collection**

Website information is automatically collected when accessing the website through the Hypertext Transfer Protocol (HTTP).

#### **2.2.1. Necessity of Providing Data**

Providing personal data is necessary for the use of the Website and related features. To the extent that processing is based on consent, the provision of data is voluntary.

### **2.3. Retention and Use Period**

#### **2.3.1. General Retention**

The Company retains personal information until the user withdraws their consent or unsubscribes.

#### **2.3.2. Legal Requirements**

Notwithstanding the foregoing, the Company may retain information for a longer period if required by applicable laws and regulations.

## **3. Cookies**

### **3.1. Cookie Usage**

When entering the website for the first time, you will be provided with a cookie notice explaining what type of cookies we use and requesting your consent. Cookies are text files placed on your device to collect standard internet log information and visitor behavior information.

### **3.2. Cookie Consent Withdrawal**

You can withdraw your consent at any time by adjusting your browser settings or deleting cookies that have already been placed on your device.

## **4. Provision of Personal Information to Third Parties**

### **4.1. General Principle**

The Company does not provide or disclose personal information to any third party without the user's consent, unless required by applicable laws and regulations.

### **4.2. Exceptions**

However, personal information may be provided to third parties in the following cases:

- (a) When the information is provided in a form that does not allow identification of the individual, for the purposes of statistics, academic or market research;
- (b) When the Company undergoes a merger, acquisition, or business transfer, provided that users are notified in advance and given the opportunity to withdraw their consent;
- (c) When the disclosure is necessary for the purpose of preventing or detecting a crime, or for the purpose of investigations;
- (d) When disclosure is required or authorized by or under any law or by the order of a court;
- (e) When it is difficult to obtain the user's consent due to emergency circumstances and the information is necessary to protect the life, body, or property of the user or a third party;
- (f) When the Company has any other lawful basis for disclosure under applicable data protection laws.

### **4.3. Prior Notification**

If the Company intends to provide personal information to a third party for any reason not stated above, it shall notify the user in advance of the recipient, the purpose of provision, the specific data to be shared, and the retention and usage period, and obtain the user's explicit and individual consent.

### **4.4. Categories of Third-Party Service Providers**

We may share your personal data with the following categories of third-party service providers:

- (a) Cloud storage providers
- (b) Web hosting providers
- (c) Email notification providers
- (d) Webpage analytics providers
- (e) Internal content management systems (CMS)
- (f) Internal collaboration tools

### **4.5. Data Processing Agreements**

Before sharing any personal data with third parties, we conclude appropriate data processing agreements with the recipients that guarantee security of the data and the rights of data subjects.

## **5. Cross-Border Transfers of Personal Information**

### **5.1. Transfer Locations**

Personal information collected by the Company may be transferred to and stored in countries outside of the British Virgin Islands. In particular, personal information may be processed on servers located in the Republic of Korea, depending on the Company's service architecture and operational needs.

### **5.2. Safeguards**

Regardless of where personal information is processed, the Company implements appropriate safeguards to ensure that such information is handled securely and in accordance with this Privacy Policy and applicable laws.

### **5.3. Notice and Consent for Cross-Border Transfer**

When personal information of users located in the Republic of Korea is transferred abroad, the Company provides prior notice of the following matters and obtains consent, except where otherwise permitted by law:

- (a) The country to which the personal information will be transferred;
- (b) The date, method, and frequency of transfer;
- (c) The recipient of the personal information and its contact information;
- (d) The items of personal information transferred;
- (e) The purpose of use by the recipient and the retention period.

Such information will be clearly provided to users at the time of consent. Where continuous or regular transfers are involved, a one-time consent will suffice until withdrawn by the user.

### **5.4. Jurisdictional Notice**

Personal information may be collected and processed in the British Virgin Islands, where the Company is located, or in other jurisdictions where the Company operates or where its servers are located, including the Republic of Korea. If you are a resident of a jurisdiction with data protection laws such as the GDPR or CCPA, please note that your personal information may be transferred to, and processed in, a jurisdiction that may not offer the same level of data protection as your home jurisdiction.

## **6. Rights of Users and Their Legal Representatives**

### **6.1. User Rights**

Users, or their legal representatives, may exercise the following rights regarding their personal information:

- (a) Request access to their personal information
- (b) Request correction of inaccurate or incomplete information
- (c) Request deletion or suspension of processing
- (d) Withdraw consent to the collection and use of personal information. The withdrawal of consent by the data subject shall not affect the lawfulness of processing based on consent before its withdrawal.
- (e) Data Portability: Request a copy of data you provided directly to us or request transfer to a third party
- (f) Restriction of Processing: Request restriction of processing to storage only in certain circumstances
- (g) Objection: Object to processing based on legitimate interests
- (h) Objection to Marketing: Object at any time to processing of data for marketing purposes

However, certain requests may be limited in accordance with applicable laws and regulations, particularly where the information is required to be retained.

### **6.2. How to Exercise Rights**

Users may exercise their rights by contacting the Company via the email address provided in Article 9. The Company will respond within 10 business days from receipt of the request, or within a reasonable extension period if unavoidable circumstances arise, in which case the user will be informed without delay.

### **6.3. Verification**

The Company may request supporting documentation, such as a power of attorney, and may verify the identity of the requesting party to ensure that the request is made by the user or a duly authorized representative.

## **7. Deletion of Personal Information**

### **7.1. Deletion Timing**

The Company promptly deletes personal information when the purpose of its collection and use has been fulfilled, or when the user withdraws consent or unsubscribes.

### **7.2. Deletion Methods**

Personal information stored in electronic form will be deleted using a secure method that prevents recovery. If printed on paper, it will be shredded or incinerated.

### **7.3. Legal Retention**

However, if the retention of certain information is required by applicable laws or regulations, such information will be stored separately and retained for the legally prescribed period before deletion.

## **8. Security Measures**

### **8.1. Technical and Organizational Measures**

We implement appropriate technical and organizational measures to safeguard your personal data against loss, theft, and unauthorized use, access or modification.

### **8.2. Transmission Security**

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of information transmitted through the website or over email; any transmission is at your own risk.

### **8.3. Liability Limitation**

The Company shall not be held liable for any loss or damage caused by unforeseeable incidents—such as cyberattacks—provided that it has taken reasonable and appropriate technical and administrative measures in accordance with industry standards.

## **9. Personal Information Protection Contact**

### **9.1. Contact Information**

The Company is the data controller responsible for the collection and use of personal information. The Company has also designated a person or department to oversee personal data protection and handle related inquiries or complaints. The relevant contact information is as follows:

- Data Controller: House Party Labs Limited
- Address: Charles Court 1st Floor 189 Main Street PO Box 4406 Tortola British Virgin Islands
- Name: HPP Security Team
- Email: [hello@hpp.io](mailto:hello@hpp.io)

## **9.2. Response Commitment**

Users may contact the above for any questions, concerns, or complaints related to the handling of their personal information. The Company will respond promptly and in good faith.

## **9.3. Complaint Process**

If you wish to make a complaint about how we process your personal data, please contact us in the first instance and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the data protection supervisory authority in the country in which you live or work or where you think we have infringed data protection laws.

## **10. Liability on Connected Sites**

The Company's website may contain links to third-party websites or services. As the Company does not operate or control these external sites, it is not responsible for their content, accuracy, or legal compliance. Users are encouraged to review the privacy policies of any linked sites, as this Privacy Policy does not apply to services provided by third parties.

## **11. Changes to This Privacy Policy**

The Company may update this Privacy Policy from time to time. Users are advised to check the Company's website regularly for the latest version of this policy. Any changes will be posted on the Company's website, and users are encouraged to review the policy. The revised Privacy Policy will take effect on the date specified in the notice unless otherwise stated.

History of previous enactment: [HPP Privacy Policy\(April 22, 2025\)](#)

## **12. Disclosure of Others' Personal Information**

If you disclose personal information about others in your message, you declare and warrant that you are authorized to do so and that you will permit us to use such information in accordance with this Privacy Policy.

## **13. Representative and Joint-Controllorship (if applicable)**

If the Company works with partner organizations or representatives in specific jurisdictions (e.g., EEA), appropriate arrangements will be made to ensure compliance with local data protection regulations. In such cases, the Company may act as a joint-controller with partner organizations for certain processing activities.

## **14. Personal Data from Third Parties**

In exceptional cases (such as events, contests, competitions, or token purchases), we may obtain your personal data from third-party service providers. We will process it only if it was obtained in compliance with applicable data protection regulations.

## **15. Changes and Updates**

This version of the Privacy Policy is effective as of August 18, 2025, and applies to any new user of the Website, Newsletter, Products, Programs and Events.

## **16. Applicable Laws and Compliance**

We process personal data in accordance with:

- British Virgin Islands Data Protection Act 2021 (DPA)
- Other applicable local data protection laws in jurisdictions where we operate

## **17. Disclaimer**

This Privacy Policy may contain links to other websites. By clicking on a link you will be redirected to another website or document. These websites can be beyond the Company's sphere of influence. Liability is excluded. The operators of the linked websites are solely responsible for their content.