

PRIVACY POLICY

PRIVACY AND COOKIES POLICY PURSUANT TO ART. 13 OF EU REGULATION NO. 2016/679 OF 27 APRIL 2016

This information is provided pursuant to and for the purposes of art. 13 of EU Regulation no. 2016/679 of 27 April 2016 (hereinafter also "GDPR") on the protection of individuals with regard to the processing of personal data. Specifically, the Data Controller, as identified below, wishes to inform that, in implementation of the obligations deriving from the GDPR, it is required to provide some information regarding the methods and purposes of the processing of personal data, of which the same may come into possession upon consultation and use of the website, accessible at the web address <https://heliosfund.io/> (hereinafter also the "Site"), by the user who accesses the Site for any reason (hereinafter also "User").

DATA CONTROLLER

The Data Controller for all personal data collected and processed and used in relation to the management of the Site, is HF Solution Inc, c/o Local Agent Services LLC, at 256 Chapman Road, Suite 105-4, Newcastle, Newark, 19702, email: business@heliosfund.io.

1. TYPE OF DATA PROCESSED

1.1 Personal data

In the optional, explicit and voluntary use of the Site, the following personal data may be acquired: - name, surname, e-mail address, telephone number; All data entered voluntarily by the User will be visible by the Data Controller and its agents. Personal data, collected and recorded on a voluntary basis of the User, will be processed in a strictly confidential form by the Data Controller and by the subjects appointed by the same, and may be used only for statistical purposes in aggregate form or in any case in such a way as to make them anonymous.

1.2. Navigation data

The computer systems and software procedures used to operate the Site may acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site to check its correct functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the Site of the Data Controller only at the request of the supervisory bodies in charge.

2. PURPOSE OF THE PROCESSING

a. Personal data processed for the correct execution of the Site: the personal data collected are processed in order to allow the use of the information request service and subscriptions

to information services. These data may also be processed for the fulfillment of all obligations imposed by law.

b. The personal data processed for the purpose of direct marketing are: name, surname, e-mail, telephone number. In the event that the User has expressed his consent at the time of subscription to the newsletter, or expresses it subsequently and until the revocation of the same, personal data may be processed by the Data Controller also for direct marketing purposes, or for sending informative, advertising and / or promotional e-mails, and more generally for sending commercial communications. This processing will be carried out through automated contact methods, and in particular through e-mail and through other methods. The Data Controller reserves to process the aforementioned data in aggregate form, in compliance with the measures prescribed by the EU Regulation and the Guidelines of the Privacy Authority and by virtue of the specific exemption from consent provided by the same Authority, for electronic analysis and processing aimed at periodically monitoring the development and economic performance of the Data Controller's activities, for the purpose of improving its services.

3. LEGAL BASIS OF THE PROCESSING

The Data Controller processes personal data relating to the User on the following legal bases:

- the processing is necessary for the execution of a contract with the User and / or the execution of pre-contractual phases;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- the User has given consent for one or more specific purposes;

The Personal Data collected for the purposes of contacting the User, displaying content from external platforms, Analytics / Remarketing / behavioral targeting, are always provided by the User subject to express consent. However, it is always possible to request the Data Controller to clarify the specific legal basis of each processing and, in particular, to specify whether the processing is based on a regulatory obligation, is provided for in a contract or is necessary to conclude a contract. The User's consent can be freely revoked at any time by writing an e-mail to: business@heliosfund.io.

4. PROCESSING METHODS

Personal data are processed with automated and non-automated tools, for the purposes for which they were collected. Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access. The data collected may be used on behalf of the Data Controller, by the administrators in charge of carrying out processing services and the correct performance of the Site's activities. The processing operations connected to the web services of this Site may also take place at the web service provider. It should be noted that personal data will be kept and controlled, also in relation to the knowledge acquired on the basis of technical progress, the nature of the data and the specific characteristics of the processing, through the adoption of appropriate and preventive security measures, both physical and logical, in order to minimize the risks of destruction or loss of the data; unauthorized access; of processing not allowed or not in accordance with the purposes of the collection. The data will be stored on servers located in the European

Union. The processing will be carried out by the Data Controller and by the persons in charge expressly authorized by the Data Controller.

5. DURATION OF DATA RETENTION

The data necessary for the provision of the service will be kept by the Data Controller for the time necessary to provide the requested services or until the exhaustion of the service itself by the Data Controller. The Data Controller may retain the user's personal information even after the provision of the intended services if this retention is reasonably necessary to comply with legal obligations, meet regulatory requirements, resolve disputes between users, prevent fraud and abuse or apply this privacy policy. In particular, the data provided will also be kept for the following period:

- Data provided for direct marketing purposes: the same duration provided for the provision of the services provided by the Data Controller, or until the revocation of consent through the unsubscription link in the same e-mail, or through the address: business@heliosfund.io.
- Navigation data: they will be kept for the technical time necessary to process the functions for which they were collected and in any case for a maximum period of 6 months.

The Data Controller will keep the data of the interested party until the revocation of the consent by them, with the notice that, in any case, at the relative expiry, such data will be automatically deleted or made anonymous in a permanent and non-reversible way.

6. COOKIES

In order to make its services as efficient and simple to use as possible, this Site may make use of cookies. Therefore, when visiting the Site, a minimum amount of information may be placed on the User's device, such as small text files called "cookies", which are saved in the directory of the User's web browser. There are different types of cookies, but basically the main purpose of a cookie is to make the Site work more effectively by enabling certain features. Cookies are used to improve the User's overall navigation.

Especially:

- They allow you to navigate efficiently from one page to another of the Site.
- They store the username and preferences entered.
- They allow you to avoid entering the same information (such as username and password) several times during your visit.
- They measure the use of the services by the Users, to optimize the browsing experience and the services themselves.
- They present targeted advertising information based on the interests and behavior expressed by the User while browsing.

There are various types of cookies. Below are the types of cookies that can be used on the Site with a description of the purpose related to the use. The Site uses the following types of cookies:

Technical cookies

Cookies of this type are necessary for the proper functioning of some areas of the site. Cookies in this category include both persistent cookies and session cookies. In the absence of such cookies, the Site some portions of it may not function properly. Therefore, they are always used, regardless of the preferences of the user. Cookies in this category are always sent from our domain.

Analytical cookies

Cookies of this type are used to collect information on the use of the site. The Data Controller uses this information for statistical analysis, to improve the Site to simplify its use, as well as to monitor its correct functioning. This type of cookie collects information anonymously on the activity of users on the Site on the way in which they arrived at the Site to the pages visited. Cookies in this category are sent from the Site itself or from third-party domains.

Third-Party Cookies

These cookies will be installed only if the Site Owner enables the related features made available by the platform. Especially: Google Analytics: Google Analytics is a web analytics service provided by Google Inc. ("Google"). (USA), for the purposes of history, visit count, navigation statistics. For further information, please consult the information and privacy notes relating to the operation and consent to the use of Google cookies published by them.

Except for technical cookies strictly necessary for normal navigation, the provision of data is left to the User who decides to browse and use the Site after having read the brief information contained in the banner and to use the services that involve the installation of cookies. The User can therefore avoid the installation of cookies by maintaining the banner (thus refraining from closing it by clicking on the "ok" button), as well as through the appropriate functions available on his browser. We also remind you that most internet browsers are initially set to accept cookies automatically. This means that you have the possibility, at any time, to set your browser to accept all cookies, only some, or to refuse them, disabling their use by the sites. In addition, you can normally set your browser preferences so that you are notified whenever a cookie is stored on your computer. Finally, at the end of each browsing session, you can delete the collected cookies from the hard disk of your device. If you want to delete the cookies installed in the cookie folder of the browser used, please note that each browser has different procedures for managing the settings. Please note that in case of disabling cookies the Site may not work properly.

7. RECIPIENTS AND CATEGORIES OF RECIPIENTS

The personal data provided will neither be disseminated nor disclosed to the public. The data may instead be communicated to well-defined subjects only by the Data Controller for the purposes indicated, including the Data Processors and persons in charge, legal, tax and business consultants, who will in any case remain independent data controllers, unless external data processors are expressly appointed;

8. RIGHTS OF THE INTERESTED PARTY

The User has the right:

- access, rectification, cancellation, limitation and opposition to the processing of data;
- to obtain without hindrance from the data controller the data in a structured format of common use and readable by automatic device to transmit them to another data controller;
- to revoke the consent to the processing, without prejudice to the lawfulness of the processing based on the consent acquired before the revocation;

In this regard, we inform you that the deadline for replying to the User is, for all rights of one month from receipt of the request, extendable up to three months in cases of particular complexity. The exercise of the aforementioned rights can be exercised by written communication to be sent by email to the address: business@heliosfund.io.

9. COMPLAINT TO THE DATA PROTECTION AUTHORITY

The User has the right to lodge a complaint with the competent Data Protection Authority. The complaint allows the interested party to contact the Authority to complain of a violation of the regulations on the protection of personal data pursuant to art. 77 of the GDPR and to request a verification from the Authority. The complaint can be proposed by the User to the Authority of the place where he resides, or in the place where he works or in the one where the alleged violation occurred. The User also has the right to bring a judicial remedy before the Court if he considers that his rights have been violated as a result of processing.

This privacy policy may require an update from time to time, e.g. due to the implementation of new technologies or for the processing of data for purposes other than those indicated. The Data Controller therefore reserves the right to modify or supplement this privacy policy at any time. In this case, it will be the responsibility of the Owner to publish the changes and inform the User by communication on the Site.

March, 8, 2022