

PRIVACY POLICY

Hashira Works Pvt Ltd · hashiraworks.com

Effective Date: April 16, 2025

Last Updated: January 16, 2026

Scope of this Policy: This Privacy Policy applies to Hashira Works Pvt Ltd and all products and platforms developed, operated, or maintained by Hashira, including but not limited to PossibleWorks (possibleworks.ai), Garden Finance (garden.finance), Catalog, Explorer, Faucet, Merry, and any future products. Where a specific product has its own supplemental privacy policy, both documents apply and the more specific terms govern.

1. Introduction

Hashira Works Pvt Ltd ("Hashira", "we", "us", or "our") is a blockchain infrastructure and Web3/AI engineering company incorporated in India, headquartered at 2nd Floor, Sreshta Marvel, Sy. No. 136, Kondapur Main Road, Gachibowli, Hyderabad, Telangana 500032.

We build and maintain products that span decentralised finance (DeFi), blockchain infrastructure, AI-powered tools, and enterprise SaaS. This Privacy Policy describes how we collect, use, disclose, and protect personal information across our corporate website (hashira.io) and all products developed internally by Hashira.

Please read this Privacy Policy carefully before using our website or any of our products. By accessing or using our services, you acknowledge that you have read and agree to the practices described herein. If you do not agree, please discontinue use of our services.

2. Definitions

In this Privacy Policy:

- "Personal Data" means any information relating to an identified or identifiable natural person.
- "Platform" means any website, application, dApp, API, SDK, or service developed or operated by Hashira, including individual products listed in the scope above.
- "User" or "you" means any individual who accesses or uses our corporate website or any Platform.
- "On-chain Data" refers to information recorded on a public blockchain, which by nature is immutable and publicly accessible.
- "Processing" means any operation performed on Personal Data, including collection, storage, use, disclosure, or deletion.

3. Information We Collect

The type of data we collect depends on how you interact with Hashira and our Platforms. The categories below cover our full product ecosystem.

3.1 Information You Provide Directly

We collect personal information you voluntarily provide when you:

- Contact us via our website, email, or support channels
- Register or sign up for any Platform or SaaS product (e.g., PossibleWorks)
- Apply for a career opportunity through our website or recruitment platforms (e.g., Wellfound)
- Participate in surveys, marketing campaigns, or events
- Enter into a business or client engagement with Hashira

This may include: full name, email address, phone number, organisation name, job title, professional background, resume or portfolio, date of birth (where required by law), and any other information you choose to provide.

3.2 Information Collected Automatically

When you visit our Platforms, we automatically collect certain technical and usage data, including:

- IP address and approximate geographic location
- Browser type, version, language, and operating system
- Device type and screen resolution
- Pages visited, time spent, navigation paths, and referral URLs
- Page interaction data (scrolling, clicks, mouse-hovers)
- Download errors, page response times, and session duration
- Login timestamps and access logs

3.3 Blockchain and Wallet Data

For DeFi and blockchain products (such as Garden Finance), we may collect or process:

- Blockchain wallet addresses (public keys)
- On-chain transaction records including deposits, withdrawals, swaps, and transfers
- Token balances and wallet activity visible on the respective blockchain
- Solver, order, and intent data related to cross-chain operations

Important: Transactions recorded on public blockchains are immutable and permanently visible to anyone. Hashira has no ability to delete or modify on-chain data. This data exists independently of any account you hold with us.

3.4 Cookies and Tracking Technologies

Our Platforms use cookies, web beacons, pixels, and similar tracking technologies. These help us distinguish users, personalise experiences, improve performance, and gather analytics.

Types of cookies used include:

- Essential Cookies — required for core functionality (e.g., session management). Cannot be disabled.
- Analytics Cookies — collect aggregated, anonymised usage statistics (e.g., pages visited, time on site).
- Preference Cookies — remember your settings and personalisation choices.
- Marketing Cookies — used (with consent) to deliver relevant communications.

You can control or disable non-essential cookies via your browser settings. Disabling cookies may limit functionality on some Platforms. Cookie preferences are managed separately per Platform.

4. How We Use Your Information

We use Personal Data collected across our Platforms for the following purposes:

- To provide, maintain, and improve our products and services
- To verify and process account registrations and transactions
- To respond to inquiries, support requests, and business communications
- To evaluate job applications and manage recruitment processes
- To send service-related notices, updates, and technical communications
- To send promotional or marketing communications (only with your consent, or where permitted by law, and always with an option to unsubscribe)
- To conduct surveys, research, and product analytics
- To detect, investigate, and prevent fraud, abuse, or security incidents
- To comply with applicable legal obligations and regulatory requirements
- To enforce our Terms of Service and other agreements
- To carry out upgrades, customisations, and maintenance of our Platforms

We do not use your Personal Data for automated decision-making or profiling that produces significant legal effects on you without your knowledge.

5. Legal Basis for Processing

We process your Personal Data on the following legal grounds, depending on the applicable jurisdiction:

5.1 India (Digital Personal Data Protection Act, 2023)

- Consent — where you have provided explicit consent for a specified purpose.
- Legitimate Uses — where processing is necessary for purposes as notified by the Central Government or for compliance with applicable law.
- Legal Obligation — where required by Indian law, court order, or governmental direction.

5.2 European Union / EEA (GDPR)

For users whose data is processed under GDPR:

- Consent (Art. 6(1)(a)) — for marketing communications and non-essential cookies.
- Contract (Art. 6(1)(b)) — for processing necessary to perform a contract or respond to a pre-contractual request.
- Legal Obligation (Art. 6(1)(c)) — to comply with EU or Member State law.
- Legitimate Interests (Art. 6(1)(f)) — for security, fraud prevention, business analytics, and managing enquiries, where these interests are not overridden by your fundamental rights.

5.3 United States

For users accessing PossibleWorks or other Hashira products from the United States, data is processed consistent with applicable US state and federal privacy laws, including CCPA/CPRA where applicable.

6. Data Sharing and Disclosure

We do not sell, rent, or trade your Personal Data to third parties for their own commercial purposes. We may share data in the following limited circumstances:

6.1 Service Providers and Processors

We engage trusted third-party vendors to support our operations — including cloud infrastructure providers (e.g., Microsoft Azure), analytics platforms, communication tools,

payment processors, and recruitment platforms. These vendors are contractually obligated to process data only as instructed by us and to maintain appropriate security standards.

6.2 Affiliated Products and Group Companies

Personal Data may be shared across Hashira's internal products and group entities where necessary to provide integrated services or for consolidated analytics. All such sharing is subject to this Privacy Policy.

6.3 Legal and Regulatory Requirements

We may disclose Personal Data if required by applicable law, regulation, court order, or lawful governmental request; or if we reasonably believe disclosure is necessary to protect the rights, property, or safety of Hashira, our users, or the public.

6.4 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of assets, Personal Data may be transferred to the relevant successor entity. We will notify users of any such transfer that materially affects how their data is used.

6.5 Third-Party Blockchain Networks

For blockchain products, transaction data is broadcast to and recorded on public blockchains operated by third parties (e.g., Bitcoin, Ethereum). This data becomes publicly accessible and is outside our control or ability to delete.

7. GDPR Compliance — EU/EEA Users

Where Hashira processes data of EU/EEA-domiciled individuals, we implement the following measures in compliance with the General Data Protection Regulation:

Data Sovereignty: For SaaS products operating on Microsoft Azure, data sovereignty options are available to ensure data is stored and processed in a region consistent with GDPR localisation requirements.

Data Encryption: Data is encrypted both at rest and in transit using industry-standard encryption.

Access Controls: Role-based access control (RBAC) and data masking restrict access to sensitive data to authorised personnel only.

Audit Logging: Comprehensive audit logs track and monitor data processing activities for compliance purposes.

Data Breach Response: We maintain incident response procedures and will notify relevant supervisory authorities and affected users in the event of a qualifying data breach within legally required timeframes.

Data Protection Officer: A designated Data Protection Officer (DPO) oversees GDPR compliance across our products. Contact:

For any GDPR-related enquiries, please contact us at the details in Section 13.

8. Your Rights

Subject to applicable law, you have the following rights regarding your Personal Data:

- Right of Access — Request a copy of the Personal Data we hold about you.
- Right to Rectification — Request correction of inaccurate or incomplete data.
- Right to Erasure (Right to be Forgotten) — Request deletion of your Personal Data. For blockchain products, on-chain data cannot be erased; this right applies only to off-chain data held by Hashira.
- Right to Restriction — Request that we limit how we process your data in certain circumstances.
- Right to Data Portability — Request your data in a structured, machine-readable format.
- Right to Object — Object to processing based on legitimate interests or for direct marketing purposes.
- Right to Withdraw Consent — Where processing is based on consent, withdraw it at any time without affecting the lawfulness of prior processing.
- Right to Lodge a Complaint — File a complaint with a competent supervisory authority in your jurisdiction.

Account Deletion: Users may request deletion of their account at any time via account settings or by contacting us at the details in Section 13. Upon deletion, associated data will be removed or anonymised, subject to legal retention obligations. Residual copies in backup systems will be deleted within a reasonable timeframe. Some data may be retained where required by law or to protect our legitimate interests (e.g., resolving disputes, enforcing agreements).

We will respond to verified requests within 30 days (or within the timeframe required by applicable law). We may need to verify your identity before processing your request.

9. Data Retention

We retain Personal Data only for as long as necessary to fulfil the purposes described in this policy, or as required by applicable law. Our general retention guidelines:

- Contact and enquiry data: Up to 2 years from last communication
- Job application data: Up to 1 year post-recruitment process (or longer with your explicit consent for future opportunities)
- SaaS product / registered user data: For the duration of the account, and up to 5 years after termination of the relationship, to comply with legal, tax, and regulatory obligations
- Client engagement data: Up to 7 years, as required by applicable business and tax laws
- Transaction and blockchain data (off-chain records): Up to 5 years post-relationship, with possible extensions for compliance purposes
- Website analytics: Retained in aggregated, anonymised form with no fixed retention limit

When Personal Data is no longer required, we securely delete or anonymise it.

10. Data Security

We implement appropriate technical and organisational security measures to protect your Personal Data from unauthorised access, disclosure, alteration, loss, or destruction. These include:

- Encrypted data transmission (HTTPS/TLS) across all Platforms
- Encryption at rest for stored data on cloud infrastructure
- Role-based access controls limiting data access to authorised personnel
- Regular security audits and vulnerability assessments
- Incident response procedures for data breach management

No method of transmission over the internet or electronic storage is completely secure. While we strive to use commercially acceptable means to protect your data, we cannot guarantee absolute security. If you believe the security of your interaction with us has been compromised, please notify us immediately.

11. International Data Transfers

Hashira is incorporated and headquartered in India. Data you provide may be transferred to, stored, and processed in India or other countries where our service providers operate (including the United States and EU member states). We take appropriate steps to ensure such transfers comply with applicable data protection law, including relying on:

- Standard Contractual Clauses (SCCs) for transfers to/from the EU/EEA
- Adequacy decisions where applicable
- Your explicit consent where required

For PossibleWorks users based in the United States, the registered address for legal notices is: 2100 N Greenville Ave, #105, Richardson, TX 75082, United States.

12. Product-Specific Notes

12.1 PossibleWorks (possibleworks.ai)

PossibleWorks is an enterprise HR/performance SaaS product. In addition to this policy, PossibleWorks operates its own Terms of Use and supplemental privacy terms. Key points:

- Data collected includes name, email address, and date of birth for registered users.
- Cloud infrastructure is hosted on Microsoft Azure with GDPR-compliant data sovereignty configurations.
- Registered users consent to communications via email, SMS, and other channels. Marketing opt-out is honoured on a best-efforts basis.
- Subscription auto-renewal and cancellation policies apply as per PossibleWorks terms.

12.2 Garden Finance (garden.finance)

Garden Finance is a Bitcoin bridge and DeFi protocol. In addition to this policy, Garden Finance operates its own Privacy Policy and Terms of Service. Key points:

- Wallet addresses, transaction data, and on-chain activities are collected and processed.
- On-chain data is inherently public and immutable — erasure rights do not apply to such data.
- Technical metadata (IP, browser, session data) is collected to enhance platform security and user experience.
- Cookie and tracking data may be shared with third-party partners assisting in platform development.

12.3 Other Internal Products

Catalog, Explorer, Faucet, Garden Dashboard, Merry, and any future products developed by Hashira are governed by this Privacy Policy as the baseline. Any product-specific terms will be published on the respective platform and will supplement (not replace) this policy.

13. Third-Party Links and Services

Our Platforms may contain links to third-party websites, tools, and services not operated by Hashira. This Privacy Policy applies solely to Hashira-operated properties. We are not responsible for the privacy practices of third parties. We encourage you to review the privacy policies of any third-party services you access through our Platforms.

14. Children's Privacy

Our Platforms and services are not directed at individuals under the age of 18. We do not knowingly collect Personal Data from minors. If you believe we have inadvertently collected data from a person under 18, please contact us immediately and we will take prompt steps to delete such data.

15. Communications and Anti-Spam

Hashira has a zero-tolerance spam policy. Where our products include messaging features, users must not use them to send unsolicited, bulk, or indiscriminate messages. Violations may result in account suspension or termination.

You may opt out of marketing communications at any time by using the unsubscribe link in any email or by contacting us directly. Transactional and service-related communications are not subject to opt-out.

16. Intellectual Property

All content on our Platforms — including design, text, graphics, interfaces, code, trademarks, and logos — is owned by or licensed to Hashira Works Pvt Ltd. No content may be copied, reproduced, modified, or distributed without our prior written consent. User-generated content submitted to our Platforms remains your property; however, by submitting content for public display, you grant Hashira a worldwide, royalty-free, non-exclusive licence to use such content in connection with our services.

17. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices, products, legal requirements, or technology. When material changes are made, we will:

- Update the "Last Updated" date at the top of this document
- Notify registered users via email where practicable
- Post a prominent notice on affected Platforms

Your continued use of our Platforms after changes are posted constitutes acceptance of the updated policy. If you disagree with material changes, you should stop using the relevant Platform and contact us to close your account.

18. Governing Law and Dispute Resolution

This Privacy Policy is governed by the laws of India. Any disputes arising in connection with this policy shall be subject to the exclusive jurisdiction of the courts in Hyderabad, Telangana, India, except where applicable law requires otherwise (e.g., EU residents may have rights before their local supervisory authority).

19. Contact Us

For any questions, concerns, data subject requests, or complaints regarding this Privacy Policy or the handling of your Personal Data, please contact us at:

Hashira Works Pvt Ltd

2nd Floor, Sreshta Marvel, Sy. No. 136, Kondapur Main Road
Gachibowli, Hyderabad, Telangana 500032, India

Website: <https://hashira.io>

LinkedIn: [linkedin.com/company/hashiraio](https://www.linkedin.com/company/hashiraio)

Privacy Enquiries: privacy@hashiraworks.com

We will respond to all legitimate privacy enquiries within 30 days.

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