

Privacy Policy

Last amended: 14.04.2026

Aketon Network Ltd., a legal entity incorporated under the laws of Seychelles – located at Orion Complex, Victoria, Mahe (“Company”, “We”, “Our” and “Us”), is the owner of the website <https://ake.net> (the “Website”) and the system allowing you to browse the Internet by redirecting users’ communications through other users’ devices (all together, the “System”). We are concerned about your privacy and have developed this Privacy Policy in order to assist you (“User”, “Customer”, “You”) in making decisions about your use of the System.

THIS PRIVACY POLICY IS A LEGALLY BINDING AGREEMENT BETWEEN YOU AND US. BY ACCESSING AND USING THE SYSTEM, OR PROVIDING INFORMATION TO US IN OTHER FORMATS, YOU AGREE AND ACCEPT THE TERMS OF THIS PRIVACY POLICY AS AMENDED FROM TIME TO TIME AND CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY.

The definitions contained in the Terms of Service available on the Website shall apply to this Privacy Policy unless otherwise provided. In addition to this Privacy Policy, please review the Terms of Service, which are incorporated into this document by reference. In anything not expressly set forth in this Privacy Policy, the Parties shall be governed by the Terms of Service.

For purposes of the Privacy Policy, “Personal Data” or “Personal Information” shall mean any information identifying or relating to a specific individual that the Customer provides to the Company and/or that the Company collects about the Customer and/or information that the Company receives from third parties. The definition of Personal Data also includes information referred to as ‘personally identifiable information’ or ‘personal information’ under applicable data privacy laws, rules or regulations, including GDPR and CCPA.

For your convenience, this Privacy Policy is divided into the following sections:

1. PERSONAL DATA PROVIDED AND PROCESSED.
2. LEGAL BASIS AND USE OF PERSONAL DATA.
3. SHARING CUSTOMER’S PERSONAL DATA.
4. THIRD PARTIES AND THEIR PRIVACY POLICIES.
5. SECURITY.
6. CUSTOMER’S RIGHTS.
7. HOW LONG PERSONAL DATA WILL BE PROCESSED.
8. DIRECT MARKETING RIGHTS AND OPT-OUT OPPORTUNITIES.
9. CONTACT INFORMATION.
10. CHANGES TO THIS PRIVACY POLICY.

1. PERSONAL DATA PROVIDED AND PROCESSED

The Company is responsible for the processing of Personal Data that the Customer contributes to the System and for Personal Data that the Company collects in other ways in regard to the Service.

We may collect and process the following types of information:

- **Non-Personal Information.** We collect non-personal information regarding your usage of the System in order to enable us to provide the Service and continually improve it, due to security reasons and so that we can perform audits and monitor usage statistically. Such information is deemed to be non-identifiable and non-personally identifiable information that is generated as

a result of a user's actions. Such non-personal information may include the following information: browser type, web pages you visit, time spent on those pages, time and date of your access, any non-persistent identifiers, session information collected through cookies and similar technologies.

- **Personal Information.** It is the information intended to be private or confidential that identifies or may identify you. The Personal Information we collect and store includes your IP address, permanent online identifiers (your full name and email address if you provide this information to us (when you register or contact us through the “Contact us” option), payment and billing information (if you purchase any Service Plan) or other information we may request from time to time as necessary to provide the services.
- **Personal Information from Third-Party Applications.** The Company may also obtain Customer Personal Information from third party applications, including Payment Processors involved in servicing the System. This means that any information provided by the Customer to Third Party Applications in accordance with this Privacy Policy may also be shared with the Company and further processed and stored by the Company.

If we combine non-personal information with personal information, we shall consider the combined information to be Personal Information. This Privacy Policy, as set out above, governs and describes the collection, processing and use of Personal Information.

For the avoidance of any doubt, Customer activity when using Residential Proxies is not recorded, which means that we have no knowledge of the web pages visited by Customers and any activity on such web pages.

1.1. PERSONAL DATA AND INFORMATION PROVIDED BY THE CUSTOMER

You may provide Personal Data when You:

1. Use the Website. The Customer provides Personal Data during Registration, use of the Account and functionalities of the Website. Such Personal Data may include:
 - Email address (Login);
 - Password;
 - Information about the Customer's cryptocurrency wallet, which is used to set off Fees and transfer amounts due to the Customer as a refund and/or under the Referral Programme;
 - Transactions Information;
 - Username in the third-party account used for registration (Google, Facebook, etc.);
 - Email address on the third-party account;
 - Any other third-party account information that is available and may be shared in accordance with the policies of such third parties.
2. Use third party applications, including payment processors, that may request the following Personal Information from you in order to provide services that allow Customers to pay the Company Fees:
 - Your card or cryptocurrency wallet details;
 - Any other information required for billing purposes (may include proof of identity including photographic image, copies of any other documents necessary for identification, information deemed necessary to fulfil third party legal obligations under applicable financial or anti-money laundering legislation (if applicable in any jurisdiction)).

For avoidance of any doubt, all questions of data flow, processing, use and storage of Personal Data provided by the Customer to the third parties are reflected in respective privacy policies with such third parties. The Company therefore has no responsibility or liability for the activities of these third parties.

3. Contacting the Company: When You choose the “Contact us” option we may ask for and collect the following information:

- Full name;
- Phone number;
- Additional contact information;
- Any other information that we need to help with your request.

Please note that the Company does not intentionally process special categories of Personal Data (including any information about your health, race, religion, political views, etc.). The Company recommends that the Customer exercise caution when communicating this data when using the System, on websites (forums, comments, etc.) and elsewhere on the Internet. The Company also does not knowingly collect or knowingly allow the receipt of Personal Data from Customers under the age of 18. If the Company discovers that it has Personal Data relating to the Customer under the age of 18, the Company will promptly delete the Personal Data from the Company's records. If the Customer has reason to believe that the Company has Personal Data relating to a Customer under the age of 18, which is not permitted, please contact the Company at the email address specified in Section 10 of this Privacy Policy.

2. LEGAL BASIS AND USE OF PERSONAL DATA

2.1. Personal Data is processed and stored only in compliance with the applicable data protection legislation and by relying on one or more of the following lawful grounds:

Legal Basis	Explanation
Contractual obligations	Personal data shall be processed in order to fulfil the Company's obligations to maintain the System and provide relevant services arising out of the Terms of Service concluded between the Company and the Customer, or to take the necessary steps to conclude a contract with the Customer, if the Customer so requests. Personal Data shall be used to enable the Customer to use the System in accordance with the Terms of Service.
Legal obligations	The Company can process the Customer's Personal Data if required by law, in particular to assist any authority in conducting an investigation as may be required by law, to detect and prevent fraud and other illegal or prohibited activities, to comply with applicable financial or anti-money laundering legislation (if applicable in any jurisdiction).
Legitimate interest	The Company may use the Customer's Personal Data to monitor, analyze and improve the System, the Site and their functionality.
Consent	By accepting the Terms of Service, the Customer expressly consents to the processing of Personal Data as set out in this Privacy Policy in the ways and for the purposes set out herein. If the Customer has consented to the processing of Personal Data, the Customer may revoke such consent at any time. Please note, however, that under certain circumstances, the Company may still continue processing even if the consent is revoked, provided that one of the other legal grounds described above is applicable.

2.2 USE OF PERSONAL DATA

The Company shall process the Customer's Personal Data as the Company's purpose is to enable the Customer to use the System. The Company makes its best endeavors to make the System efficient and convenient. The Customer's Personal Data may be used in one or more of the following ways:

- to identify the Customer so that the Customer can log into the Account;
- to fulfill Our obligations arising out of the Terms of Service;
- to communicate with the Customer regarding the System, including sending information such as confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- to notify the Customer of any changes to the System, the Terms of Service or other important matters related to the use of the System;
- to protect against fraudulent, unauthorized or illegal activities;
- to operate, develop and improve the System;
- for statistical analysis;
- for carrying out advertising and marketing activities;
- for conducting surveys and research;
- to administer the Account and keep internal records;
- for communication with the Customer on other matters.

3. SHARING CUSTOMER'S PERSONAL DATA

Personal Data may be transferred to the following categories of Personal Data processors:

- Companies providing technical support of the System operation, including server and hosting companies;
- Companies providing analytical services, advertising partners and other companies related to improving the operation of the System;
- Payment Processors;
- Government authorities or legal advisors in case of suspected criminal or illegal behavior;
- Persons/companies with whom the Company enters into a business transaction or is negotiating a business transaction involving the sale or transfer of all or part of the Company's business or assets. Such transactions may include any mergers, financings, acquisitions, and bankruptcy transactions or proceedings;
- Auditors and other review organizations;
- Other persons/companies if necessary for the proper provision of services to the Customer and/or if required by the Company pursuant to law or an order of an authority.

The Company may transfer the Customer's data to the Company's counterparties (partners, branches, etc.) in different countries. The Customer's Personal Data may be stored, transferred and otherwise processed in countries outside the Customer's country of residence, which are countries that are part of the EEA or have received adequacy recognition by the European Commission, as well as countries that have not received adequacy recognition by the European Commission.

The Company shall protect Personal Data when it is transferred to recipients outside the EEA and takes all steps reasonably necessary to ensure that Personal Data is processed securely in accordance with this Privacy Policy. However, the Customer acknowledges that it understands and accepts that these countries may have different laws that provide a lower level of protection for Personal Data and that such Personal Data may become subject to disclosure laws and requirements in those countries, including disclosure to governmental authorities, regulatory agencies and individuals, as a result of a relevant governmental or regulatory request, court order or other similar process. For the avoidance of doubt, by accepting this Privacy Policy, the Customer agrees that Personal Data may be transferred to a country that has not been recognized as adequate by the European Commission.

4. THIRD PARTIES AND THEIR PRIVACY POLICIES

The Company's website may contain links to other third-party applications that are not controlled or operated by the Company. Therefore, the Company cannot be responsible for the protection and privacy of any information the Customer provides when visiting such third-party applications, and their sites and platforms are not governed by this Privacy Policy.

5. SECURITY

Unauthorized access or disclosure is prevented by the Company using effective physical, electronic and managerial procedures to protect Personal Data. The Company makes every effort to protect the Customer's Personal Data, but cannot guarantee the security of information transmitted to the Site. However, once the Company has received the Customer's Personal Data, strict procedures and safeguards will be used to prevent unauthorized access.

Furthermore, the Company cannot guarantee that there will be no loss, misuse, unauthorized acquisition or alteration of the Customer's Personal Data. The Customer confirms that when registering on the Site, it is necessary to choose a password of sufficient length and complexity and not to disclose the login and password to third parties.

6. CUSTOMER'S RIGHTS

Taking into account the differences in data protection laws that may be applicable to the Customer due to the Customer's nationality, place of residence and other factors, generally data protection laws provide the data subject (Customer) with the following data protection rights, which are also applicable to this Privacy Policy and the Company's processing of Personal Data:

- Right to information. The Customer has the right to request information regarding the scope of Personal Data processed by the Company by notifying in writing.
- Right to access. The Customer has the right to receive one (1) copy of the processed Personal Data without any charge. For further demanded copies, the Company shall charge the fee.
- Right to rectification. The Customer has the right to rectify inaccurate Personal Data concerning that Customer via a written request.
- Right to erasure ("Right to be forgotten") and to restrict processing. The Customer has the right to demand deletion or restriction of processing, and the right to object to processing based on legitimate interest under certain circumstances unless the Company has an opposite obligation required by applicable law. In these cases, the Company can stop providing opportunity to use the System if it is no longer possible so please consider this when deciding to exercise these rights.
- Right to portability. The Customer has the right to exercise the right of data portability, which means a right to get Personal Data and transfer these to another controller.
- Other rights. The Customer has other rights in accordance with this Privacy Policy and applicable laws.

The Customer shall understand and confirm that should law applicable to the Customer does not guarantee him any of the rights listed above, the Company shall not be obliged to fulfill such request.

In order to exercise data processing rights stated in the table above, the Customer should send the Company a request via the Company's support service e-mail specified in section 9 and follow the instructions provided or send the Company such a request directly through the Customer's Account settings (where available).

Please note that in some cases, in order to comply with a request, the Company may ask the Customer to provide the Company with some additional information where this is necessary to identify the Customer (as specified in clause 1 of the Privacy Policy). The Company undertakes to comply with the Customer's request free of additional charge within one month of receipt, but in some cases this period may be extended by a further two months. The Company has the right to refuse to comply with the Customer's request or charge a reasonable fee if the Customer's request is manifestly unfounded or excessive.

7. HOW LONG PERSONAL DATA WILL BE PROCESSED

The Company retains any of the Customer's Personal Data which the Company collects for as long as the Customer's Account is active according to the Terms of Service, and/or for as long as it is necessary to provide the Customer with the System, and while the Company has a valid lawful basis for processing Personal Data. The Company also erases the Customer's Personal Data after reaching the purposes for which the Company collected such data.

Please consider that the Company has the right to continue to retain some of the Customer's Personal Data even after complying with the Customer's request to delete such Personal Data in the following cases:

The Company has the lawful basis to further process the Customer's data other than a consent from the Customer. For instance, the Company may be required to do so in order to comply with applicable laws (for tax or accounting reasons, know-your-customer (KYC), anti-money laundering (AML) or other legal requirements and obligations);

The Customer's Personal Data has been anonymized in the way it cannot be used for identifying the Customer, and therefore is no longer the Customer's personal identifiable data.

8. DIRECT MARKETING RIGHTS AND OPT-OUT OPPORTUNITIES

As the Company has the right to send direct marketing communications or emails to the Customer (as set out in clause 2.2), the Customer has the right to unsubscribe from each of such communications by exercising the unsubscribe right as set out below. The Customer acknowledges that opting out of receiving direct marketing communications from the Company does not affect the Company's right to send the Customer other communications, emails or otherwise contact the Customer as permitted under this Privacy Policy.

If the Customer wishes to refuse to process Personal Data for certain purposes, the Customer should send a request to the Company at the contact email address provided in Section 9 of this Privacy Policy.

Please take into consideration the following:

- Refusal of certain processing purposes may result in the inability to provide certain (or even all) functionalities of the System to the Customer partially (or at all). The Company will make every effort to minimize such limitations of the System;
- The possibility of refusal to process Personal Data applies only to the processing of the Customer's Personal Data on the basis of the Customer's consent (as specified in clause 2.1.), unless otherwise expressly provided for by applicable law.

The Company reserves the right to process Personal Data based on the other lawful basis such as contractual obligations, legitimate interest or legal obligation, if available by virtue of applicable law, even if the Customer has opted out such processing according to the provisions of this Privacy Policy.

9. CONTACT INFORMATION

If the Customer has any questions about this Privacy Policy or about use of Personal Data, then the Customer may contact the Company at support@ake.net.

10. CHANGES TO THIS PRIVACY POLICY

The Company may change this Privacy Policy at any time. If the Company makes any changes, the Company will change the Last Updated date above. The Customer undertakes to check such changes by itself. Any updates to this Privacy Policy shall become valid as of publication on the Website (Last Amended date).

In case of substantial changes, the Company reserves the right to update the Privacy Policy subject to a relevant update notice and refreshing the Customer's consent. Unless the Customer agrees with the revised version of the Privacy Policy, the Company reserves the right to suspend use of the System which require the Customer's data processing by the Company.