



HACKTHEBOX

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This Privacy Notice was last updated on 01/01/2024.



HACKTHEBOX

PRIVACY NOTICE

You should download a copy of this Privacy Notice for future reference.

PLEASE READ CAREFULLY THE CONTENTS OF THIS PAGE BEFORE USING THE SERVICES AND OR THE WEBSITE.

THIS PRIVACY NOTICE EXPLAINS THE WHEN, WHAT, HOW, AND WHY OF THE PERSONAL DATA WE COLLECT AND PROCESS WHEN YOU VISIT OUR WEBSITE OR ACCESS AND USE OUR SERVICES AND WHO WE SHARE IT WITH. THIS PRIVACY NOTICE WILL SUPPLEMENT ANY OTHER NOTICES YOU RECEIVE FROM US AND THEY SHOULD BE READ TOGETHER.

WE MAY NEED TO MAKE CHANGES TO THIS NOTICE OCCASIONALLY, TO REFLECT ANY CHANGES TO OUR SERVICES OR LEGAL REQUIREMENTS. WE WILL POST ANY REVISIONS AT <https://resources.hackthebox.com/hubfs/Legal/PN.pdf>. WE ADVISE YOU TO CHECK THIS PAGE REGULARLY TO SEE IF ANY CHANGES HAVE BEEN IMPLEMENTED.

1. Definitions

Hack The Box	Hack The Box Ltd a company registered in England and Wales (registration number 10826193). Our registered office is located at 38 Walton Road, Folkestone, Kent, CT195QS. Our VAT number is GB272830402. (also referred to as "we," "us," "our," and "HTB")
User	The individual that has registered a User Account to access and use our Services, whether free or paid by the User or by a third party (e.g., User's employer), under the User Agreement. Individuals just visiting our website without registering an account are referred to as "Visitors". This Privacy Notice is applicable to both Users and Visitors. (also referred to as "you", "your")
Data Protection Legislation	The following legislation to the extent applicable from time to time: (a) the General Data Protection Regulation 2016/679 ("GDPR") as amended or replaced and in force from time to time and as transposed into Member-state legislation, which is retained in the United Kingdom (UK) as "UK GDPR"; (b) any applicable national law, regulation and guidelines from the competent data protection authority; and (c) any applicable successor texts or other similar national data protection law;
Data Controller	The entity that determines the purposes and means of the Processing of Personal Data.
Data Subject	The identified or identifiable natural person;
Personal Data	Any information that identifies or can be used to identify a user, directly or indirectly, including, but not limited to, first and last name, date of birth, email address, occupation or other demographic information.
Data Processor	An entity that processes Personal Data on behalf of the Controller.
Process or Processing	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Special Category Data	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Services	Hack The Box offers a wide range of online cybersecurity upskilling services through www.hackthebox.com and its subdomains ("Website"), including HTB Labs , HTB Academy , HTB Business and HTB CTF . These offerings include a range of educational content, practical resources, and interactive challenges within simulated virtual environments. The entire suite of services operates on a Software as a Service (SaaS) model, making them conveniently available online. This setup allows users to choose from various subscription options that fit to different needs and preferences, ensuring a flexible and tailored experience. There are free and paid Services. In order to access paid Services, you need a user subscription. For the avoidance of a doubt Services include the Website.
User Agreement	The agreement between Hack The Box and the User regarding the access and use of our Services that can be found here .

2. Who we are and how to contact us?

Data Controller:	Hack The Box Ltd. a company registered in England and Wales (registration number 10826193). Our registered office is at 38 Walton Road, Folkestone, Kent, CT195QS. Our VAT number is GB272830402
Contact Details:	Address: 38, Walton Road, Folkestone, Kent, UK, CT19 5QS. Email: privacy@hackthebox.com . Online: Contact Page

3. Changes.

3.1. We may change this privacy notice from time to time, to reflect any changes to our services or legal requirements. We will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may delete your account. The most recent version of the privacy notice is reflected by the version date located at the top of this privacy notice.

3.2. We encourage you to review this privacy notice often to stay informed of changes that may affect you. You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy, as of its effective date.

4. Age Limitations.

4.1. HackTheBox does not allow use of the Services by anyone younger than 18 years old, unless a written parental or legal guardian consent is provided through our relevant consent form.

4.2. In case you know or suspect that anyone younger than 18 is using our Services, please contact us at privacy@hackthebox.com and we will immediately take the necessary actions to safeguard minor's rights.

5. Third-Party Links.

Our Services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the relevant privacy notice of every website you visit.

6. When we may collect Personal Data about you as Data Controller?

6.1. Hack the Box may collect your Personal Data directly from you in the following instances:

- When you register for an account with our Services, purchase a subscription, or utilise our network, infrastructure, and/or Services.
- If you participate in our surveys or subscribe to our newsletter.
- Through your interactions with us via virtual assistants, AI chatbots, forms related to service requests or inquiries, support requests via the service, email, or other means, or when you contact us with questions, comments, complaints, or breach notifications.
- When you submit reviews, comments, ratings, feedback, testimonials, or stories about your experiences with our Services.
- As you interact with us through communication platforms such as Google Meet, Zoom, Webex, etc.

- During your interactions with our social media channels, posts, or other interactive services, such as forums.
- When you visit our website and we collect information via technologies like cookies, which gather specific types of data as your web browser accesses our site or advertisements.
- If you consent to receive marketing communications from us.
- When you participate in our promotional events, contests, or other marketing activities.
- Through your interactions with us at community events or user group meetings.

6.2. In addition to collecting data directly from you, Hack the Box may also receive your personal data from the following third-party sources:

- **Conferences and Events:** We may obtain participant information such as names, job titles, and contact details from organisers of industry-specific events like cybersecurity conferences, workshops, or seminars.
- **Forums and Online Communities:** We may collect participant data from online forums, discussion boards, or communities that are related to our Services.
- **Social Media:** These platforms may provide data about professionals' job roles, career history, and professional interests, especially when users interact with Hack the Box's content or advertisements on these platforms.
- **B2B Marketing and Sales Platforms:** We may receive data from platforms that specialise in business-to-business contacts, offering leads or insights about potential clients for our Services.
- **Employers and Educational Institutions:** We may collect information from your employer, academic institutions pursuant to specific agreements.
- **Public Sources and Databases:** We may gather information from public sources, databases, or records, including industry databases and other publicly accessible platforms.
- **Partner Referrals:** We may receive information when our third-party partners or affiliates refer you to our services.

7. What Personal Data we collect as Data Controller?

We may collect and process the following information about you:

- Documents and information that certify your identity such as name, address, phone number, date of birth, email address and personal identification numbers.
- Information related to your professional status, such as job title, employer company, business contact details and/or your LinkedIn and other social media profile information.
- Your account information – such as Services you ordered, the IP address you accessed the Service, your customer ID, fees owed and received, the use of Services or any other information related to your account.
- Your contact with us – such as a chat record when you engage in a chat session with us, an email or letter you send to us or other records of any contact you have with us.
- Audio or video data, textual data (chat transcripts, emails) or metadata (call duration, timestamps), biometric data collected during interactions through our communication platforms.
- Information about your payment method, such as credit card number, bank account number or other banking information and billing information related to any payments or issuance of invoices.
- Information provided by you to us, when you notify us of a (suspected) breach of our User Agreement.

8. Why we process your Personal Data as Data Controller?

8.1. We may process your Personal Data for the following purposes:

- To perform a contract, to authenticate users, to provide the Services and/or information regarding any updates relevant to the Services.
- Processing of orders, contracts and provision of services and/or customer support.
- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), conducting sales activities (including analysing your Personal Data and your use of our Services for making tailor made offers and quotation with the aim of entering into a customer relationship, and/or maintaining, renewing or extending a customer relationship), organising competitions or campaigns and offering promotional games of chance.
- Communicating with customers and/or potential customers (i) to provide information about our Services and affiliated companies, (ii) to provide information about offers, orders, provision of services, order status and payment, (iii) to provide support and maintenance services, (iv) to handle complaints, and (v) to answer questions from (potential) customers.
- Communicating with customers with AI driven platforms (i) to enhance performance and provide skills training, (ii) to provide tailored services and improved customer satisfaction, (iii) to improve

products and services, while increasing efficiency and effectiveness (iv) to ensure compliance and quality assurance.

- Providing information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- Performing financial processes, including (i) calculating, invoicing and collecting of service fees, (ii) processing financial transactions regarding the acceptance of orders, and (iii) granting debt collection rights to third parties.
- Investigating and processing suspected violations of our User Agreement.
- Ensuring the security of persons, goods and objects, and performing fraud detection.
- Conducting legal processes, including (i) prosecuting and defending a court, arbitration or conducting similar legal proceedings, and (ii) collecting evidence for civil legal proceedings relating to you or complying with court orders, discovery requests, subpoenas, and other appropriate legal mechanisms.
- Complying with statutory obligations, including (i) responding to lawful requests by public authorities, including meeting national security or law enforcement requirements, (ii) complying with (applicable) data retention obligations, and (iii) the provision to third parties of Data concerning customers in connection with an infringement of these third parties' rights.
- Establishing the identity of customers or third parties, including in relation to verify compliance with applicable Export Control Legislation or UN, EU, US and UK or any other applicable jurisdiction.

8.2. Forum. Any information you include in a comment on our forum may be read, collected, and used by anyone. If your Personal Data appears on our forum and you want it removed, you can contact us in privacy@hackthebox.com. If we are unable to remove your information, we will inform you why.

9. Legal Basis.

9.1. To process your information as described above, we rely on the following legal grounds:

- to enter into and perform our contract with you according to Article 6 para.1 (b) of GDPR or UK GDPR;
- to comply with our legal obligations according to Article 6 para.1 (c) of GDPR or UK GDPR;
- to pursue our legitimate interests (if those interests are not outweighed by your rights and freedoms) according to Article 6 para.1 (f) of GDPR or UK GDPR;
- to process your personal data for certain purposes upon your explicit and clear consent according to Article 6 para.1 (a) of GDPR or UK GDPR.

9.2. When we use "legitimate interests" as a legal basis to process your personal data under GDPR or UK GDPR, we clearly identify why processing your data is necessary and how it benefits our services, we ensure that processing your data is essential for our identified purposes, we balance our operational needs against your rights and freedoms, ensuring no undue impact on your privacy, we implement safeguards to protect your privacy, such as offering choices like opting out and we keep detailed records of these steps to demonstrate compliance. We might rely on the legitimate interests legal basis when processing your personal data to:

- process data for reasons related to legal protection. This helps us for the establishment, exercise, or defense of legal claims and supports the legitimate interests of Hack the Box in ensuring judicial remedies.
- oversee corporate transactions, such as mergers, acquisitions, or sales. This is crucial for our legitimate interests in expanding, consolidating, and managing our business and assets.
- facilitate and manage our business operations. This includes quality control, generating consolidated business reports, and customer service, ensuring that we run our business efficiently and effectively, meeting your expectations for high-quality service.
- safeguard the security and integrity of our services and users, we process data. This includes protection against security threats, fraud, or harmful actors, aligning with both our and your legitimate interests.
- to enhance our understanding of our business and improve customer relationships. This is aimed at fulfilling our legitimate interests in business growth, meeting customer needs, and providing you with the highest quality service.

9.3. When we use consent as legal basis to process your data you are entitled to withdraw your consent at any time by contacting Hack the Box either in writing or by electronic means or by sending an email at the address privacy@hackthebox.com. Upon receipt of a notice where your consent is withdrawn, we will without undue delay cease any processing of your Personal Data related to the consent you previously provided. Please note that withdrawing your consent does not affect the lawfulness of processing carried out before such withdrawal.

10. Who do we disclose your Personal Data with as a Data Controller?

We may share your Personal Data with:

- Our authorized employees or other workers that are bound by confidentiality, security and data protection obligations that work for one or more of our affiliate companies, including for the purpose of financial, tax, sales, marketing and operational tools and services that may be used to order or manage our Services.
- HackTheBox subsidiaries, in their capacity as data processors and in the course of providing services to us necessary for the delivery of the Services ordered.
- Partners (such as Resellers) or agents involved in delivering the Services ordered.
- The natural or legal person paying for the Services (e.g. your Employer) or organising the Services you participate (e.g., CTF event Organiser)
- Credit reference, fraud prevention, laws compliance verification agencies.
- Law enforcement agencies, administrative authorities, courts or other competent public authorities to the extent required by law.
- Another user, if you notify us that is using the Services in violation of the User Agreement or any applicable law.
- A third party that has claimed that your use of the Services violates the User Agreement or applicable law (to the extent such sharing is required by law).
- Professional service providers such as the accountants or legal advisors we use to help us conduct our business.
- Any actual or potential investor to our business.
- Authorised Third – Parties acting as Processors. We may disclose Personal Data to third parties for the purposes described in this privacy notice. In such a case we disclose only the minimum required Personal Data in order to provide the service and enter into a contract that requires the Processor to use your Personal Data only for the provision of services to us and in a manner that is consistent with our privacy standards. Examples of third parties include providers of various services such as payment, hosting, content delivery, customer support, marketing and customer relationship, software monitoring, project management and customer insight providers. We do our best to carefully select third-party providers, which process personal data as processors on behalf of Hack the Box Ltd. and we ensure that all third parties act in compliance with the protective legislation with regard to any processing of Personal Data.

11. Transfers of your Personal Data.

11.1. In all cases when we transfer your Personal Data or instruct our Processors to transfer your Personal Data outside of the UK or European Economic Area (EEA), we make sure that your information receives a similar level of protection by:

- only sending information to countries that have been formally recognized by the European Commission as having an adequate level of protection for personal data or
- using Standard Contractual Clauses approved by the European Commission to ensure appropriate safeguards are in place.
- Applying additional appropriate safeguards, whenever necessary.

11.2. You may acquire a copy of our Standard Contractual Clauses and additional safeguards by submitting a relevant request by e-mail to privacy@hackthebox.com.

12. Safeguarding your Personal Data.

12.1. We have implemented generally accepted standards of technology and operational security to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Data. We are certified with and apply ISO 9001, 27001 and 27701 standards.

12.2. For further information with regard to our security measures, please see our Technical & Organisational Security Measures list that can be accessed at <https://resources.hackthebox.com/hubfs/Legal/DSM.pdf>.

12.3. If there is a breach of security which has affected your personal data and we are the Data Controller, we will notify the competent Authority within the statutory deadline and keep you informed (where required under data protection legislation).

13. Accuracy and Retention of your Personal Data.

13.1. We do our best to keep your data accurate and up to date, to the extent that you provide us with the information we need to do so. If your data changes (for example, if you have a new email address), then you are responsible for notifying us of those changes.

13.2. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which

we use your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. More specifically, the following retention periods shall apply:

- Where providing Services, we retain the relevant data for a period of five (5) years upon contract termination.
- Where we process personal data for purposes relevant to billing, fees, invoicing or tax purposes, we retain the relevant data for a period of ten (10) years from the end of the year in which the billing was made or the relevant invoice was issued.
- Where we process personal data for marketing and commercial purposes, we retain the relevant data for a period up to the withdrawal of your consent.
- Where we process personal data to establish or defend legal claims, we retain the said data until the expiry date of claims or the final resolution of disputes.
- Where we process personal data for the promotion of Services, we retain the relevant data for a period up to five (5) years from the collection of the data.
- With regard to cookies, we retain the relevant data for a period of eighteen (18) months up to the date of collection.

13.3. At the end of the retention period, your personal data will be anonymized or securely deleted or destroyed from our physical and electronic files, in accordance with the Hack the Box's Policy, as long as their retention is no longer necessary to achieve the processing purposes.

14. Your Rights.

14.1. You have the following rights:

- **Right of Access:** You have the right to request access to your personal data processed by Hack the Box as well as to information pertaining to their processing (source of data, purposes of processing, categories of recipients, data retention period). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to Rectification:** You have the right to request the rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to Erasure:** You have the right to request the erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for their further processing by Hack the Box. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with law.
- **Right to Object:** You have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you feel such processing impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Right to Restrict Processing:** You have the right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to retain the data even if we no longer need it but you require it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to Data Portability:** You have the right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- **Right to file Complaints:** You have the right to file a complaint at any time: For the EU Users: before the Hellenic Data Protection Authority Postal Address: Data Protection Authority Offices: 1-3, Kifissias Avenue, PC 115 23, Athens, Greece, Call Centre: +30-2106475600 Fax: +30-2106475628 E-mail: contact@dpa.gr. For the UK Users: before the UK Information Commissioner's Office. HackTheBox is registered with the Information Commissioner's Office, the UK regulator for data protection matters under number ZA827838.

14.2. You may exercise the above rights directly by contacting the privacy Contact at: privacy@hackthebox.com. We will make our best efforts to respond to any request within a month. You will not have to pay in order to exercise your rights. We may request further information from you to confirm you are the owner of the data.

14.3. When we process your personal data for commercial or marketing purposes (i.e., by reaching out to you with regard to Hack The Box's products or services) you are entitled to express at any moment your desire not to receive commercial communications from Hack The Box (**opt-out**).

14.4. When we are relying on consent to process your personal data, you have the right to withdraw your consent at any time by contacting Hack the Box Ltd. either in writing or by electronic means through our Platforms or by sending an email at the address privacy@hackthebox.com. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

15. Cookies and similar technologies.

15.1. What technologies are used?

Cookies	A web cookie is a small text file that is placed on your hard drive by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Some cookies will only be used if you use certain features or select certain preferences, while other cookies will always be used. Find out more about the use of cookies on https://www.allaboutcookies.org/ .
Pixels, web beacons, tags	Pixels, web beacons, and tags are types of code or transparent graphics that contain a unique identifier. These technologies provide analytical information about user experience and help us customise our marketing activities. In contrast to cookies, these technologies are embedded invisibly on web pages or in emails.
Local storage	Local storage enables a website or application to store information locally on your device(s). Local storage may be used to improve the Hack The Box experience, for example, by enabling features, remembering your preferences and speeding up site functionality.

15.2. Purpose. For what purpose are we using cookies and similar technologies?

Authentication	To recognize you when you visit our Services, to show you the right information and personalise your experience.
Security	To help protect the safety, security, and integrity of our web properties and those who interact with us. This includes to detect, prevent, and respond to security incidents, as well as other malicious, deceptive, fraudulent, or illegal activity.
Preferences, features and services	To enable the functionality of our Services, and provide you with features, insights and customised content, to remember information about your browser and your preferences. We may also use local storage to speed up site functionality.
Customised content	To customise your experience on our Services.
Advertising	To show relevant ads to you more effectively, and to measure the performance of such ads, to learn whether content has been shown to you or the actions of someone who was shown an ad.
Analytics and research	To learn more about how well our Services perform. To determine and measure the performance of ads or posts and to learn whether you have interacted with our Services, content or emails and provide analytics based on those interactions.

15.3. Categories of cookies. We may use the following categories of cookies on our website in order to accomplish the purposes described above:

Essential Cookies:	Essential cookies enable core site functionality. These cookies are necessary for the website to function and cannot be switched off in our systems. You may set your browser to block or alert you about these cookies, but parts of the website may not function properly.
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Functional Cookies:	Functional cookies enable the website to provide enhanced functionality and personalisation. These cookies may be set by us or by third-party providers whose services we have added to our website.
Analytics Cookies	Analytics cookies allow us to count visits and traffic sources so we can measure and improve the performance of our website. These cookies help us to know which pages are the most and least popular and see how visitors move around the website.
Targeting Cookies	Targeting cookies, such as social media cookies, may be set through our website by our advertising service providers, third-party advertisers, ad networks, or data exchange partners. These cookies may be used to show you relevant advertising on other third-party sites.

15.4. When you first visit our sites using a new browser, or if you visit in private browsing mode, we will provide you with a cookies permission banner seeking your consent to use cookies as required by law. Unless and until you provide your consent, only Essential Cookies will be enabled. Other non-Essential types of cookies and similar technologies on our website, such as Functional, Analytics, and Targeting Cookies, are only enabled if you provide opt-in consent by using our website cookie banner. In the “Cookie Settings” link in our Site footer, you can be informed, manage and change your choices at any time by utilising the toggle settings.

15.5. The third-party organisations that place cookies, including your browser, data management providers and the third-party companies who pay for advertising and analytics services using this information, will have their own privacy policies.

15.6. Please review the below additional options for managing cookies:

Choice	Description
Opting Out of Interest-Based Advertising	<p>To opt-out of interest-based advertising by third parties, please see the below resources:</p> <ul style="list-style-type: none"> • Digital Advertising Alliance (DAA) self-regulatory opt-out. You can download the DAA mobile app here. • Network Advertising Initiative (NAI) self-regulatory opt-out. • European Interactive Digital Advertising Alliance (EDAA) consumer opt-out.
Browser Level	<p>To learn more about how to control cookie settings through your browser:</p> <ul style="list-style-type: none"> • For Firefox Click here • For Chrome Click here • For Internet Explorer Click here or • For Safari Click here.

16. Concerns and Complaints

If you have any complaints about this notice or the way in which we handle your Personal Data or in case you notice a misuse of your Personal Data you should immediately inform us at privacy@hackthebox.com so we can immediately take the necessary actions.



HACKTHEBOX

www.hackthebox.com

info@hackthebox.com