

## 4thTech White-label Wallet Privacy Policy Template

*This is a white-label privacy-policy template, that needs to be synced with the partner project legal framework and regulations that apply to the partner project entity. Neither this privacy-policy template nor any information materials made available to you on the Websites must be understood as legal advice. We are dealing with experimental technology, we give you no guarantee or other assurance in regards to the Wallet operation.*

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This Privacy Policy is addressed to all individuals (i.e. data subjects) who get access to and use any and all "WHITE-LABEL PARTNER" services of any of the following Internet sites: "WHITE-LABEL PARTNER URL" (without this list being exhaustive) ("you", "your" or "User"). It sets out the manner in which "WHITE-LABEL PARTNER ENTITY", and its affiliates worldwide ("Company", "we" or "us") use and protect the information you transmit to us, if any when you get access, browse or otherwise use any of the above-listed sites (hereinafter referred to as the "Site").

It may be amended or supplemented at any time by Company, in particular, to comply with any legislative, regulatory, jurisprudential or technological developments. In such a case, the date of its update will be identified at the beginning of this policy. These modifications engage the User as soon as they are posted online. The company, therefore, invites the User to regularly consult this Privacy Policy in order to be aware of any changes.

### 1. Personal Data

You have the opportunity to browse the supporting wallet Sites without disclosing any personal information about yourself. However, you may not be able to benefit from certain information or services.

Indeed, some Personal Data will be requested if you complete a form on the Site (surname, first name, email address, telephone number, etc., hereinafter referred to as your "Personal Data"). By providing this information, you expressly agree that it will be processed by us for the purposes indicated below and, if applicable, only for the purposes stated at the end of each form.

We do not collect any Personal Data without your knowledge or consent. No personal data is needed to set up the wallet or use Web3 services such as dMail or dChat. Only Personal Data provided voluntarily will be collected, data that we are committed to keeping in optimal conditions of security.

In addition, we do not collect or process sensitive Personal Data that directly or indirectly reveal your racial or ethnic origin, your political, philosophical or religious opinions, your trade union membership, your health and sexual life, and genetic data. Therefore, we request that you do not include such sensitive Personal Data about yourself or other persons in your communication and/or documents sent to us. Otherwise, we will consider that we have received the consent to use such Personal Data for the purposes of responding to your query.

## 1.2 What we collect:

\*Wallet does not collect any user data, it only requires permission to read and write from the "WHITE-LABEL PARTNER DAPP URL".

\*We may use cookies or similar technologies to analyze trends, administer the website and gather demographic information about our user base as a whole. Users can control the use of any cookies at the individual browser level.

\*We will never ask you to share your private keys or wallet backup .JSON file!

## 1.3 Security & Databases of the collected and processed information:

- Wallet: Your chosen password is encrypted off-chain and never shared with our servers.
- Local storage is used to store; (1) Wallet private keys; (2) dChat short messages, and; (3) user-initiated backup of conversations, data files and reports. The security of local storage is in the user's domain;
- Blockchain (Ethereum, Tolar HashNet, Substrate, Solana) is used to store; (1) a link to the encrypted metadata file and timestamp (dMail); (2) encrypted message, timestamp and sender address (dChat). The overall security of the blockchain network depends on its decentralization, while the access security depends on the users private key safety measures.

## 1.4. Identity of the controller

The controller is "WHITE-LABEL PARTNER ENTITY"

Email: "WHITE-LABEL PARTNER CONTACT"

## 1.5. Purposes of the treatment

We may process your Personal Data for the following purpose (s):

- Provision of the information or services that you have requested (in particular via the various forms of the wallet support Sites);
- Improving the Site, our products, and our services (including cookies);
- Contacting you to propose services and offers adapted to your centers of interest;
- Contacting you to obtain additional information or clarifications in response to your reported incidents;
- Sharing information on social networks;
- Protecting our legitimate interests.

## 1.6. Recipients

We may share your Personal Data (collected from the support Sites) with the following recipients to the extent we deem such disclosure or transmission to be necessary or desirable for satisfying the aforementioned purposes:

- Administrative, regulatory and judicial bodies;
- IT service providers that support hosting and data storage functionalities of the Site;

- Law firms, consultancy and other agencies in case we engage them for investigating and/or advising us in connection with the incidents or communications reported by you.

#### 1.7. Duration of retention of your Personal Data

We will not keep your Personal Data for longer than the time necessary for satisfying the aforementioned purposes, subject to the legal periods of limitation and to the situations where applicable laws require or allow Personal Data to be retained for a certain period of time for regulatory and compliance purposes.

#### 1.8. Rights granted to data subjects

Subject to the limits set out in the applicable data protection laws, and in particular, in the EU General Data Protection Regulation 2016/679, you may benefit from the following rights.

##### 1.8.1. Your right of access

You have the right to ask us for confirmation as to whether or not Personal Data relating to you are being processed and, where that is the case, access to the Personal Data and relevant information in that regard.

##### 1.8.2. Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete

##### 1.8.3. Your right to erasure

You have the right to ask us to erase your personal information. However, we can refuse to erase your Personal Data for instance if we have a legal obligation to keep such Personal Data.

##### 1.8.4. Your right to restriction of processing

You have the right to ask us to restrict the processing of your information.

##### 1.8.5. Your right to object to processing

You have the right to object to processing that we carry out based on the legitimate interest we pursue. However, we remain able to process your information if we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims

##### 1.8.6. Your right to data portability

Where relevant, you have the right to request to receive Personal Data concerning you which you have provided to us on in a structured, commonly used, machine-readable format and to transmit it to another controller

#### 1.8.7. No automated decision making

You are hereby informed that no automated decision-making or profiling is conducted. You will be informed of the change in this regard.

#### 1.8.8. Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact by writing a letter to the address: "WHITE-LABEL PARTNER ENTITY ADDRESS"

#### 1.8.9. Your right to withdraw your consent

Where processing relies on your consent, notably via "opt-in" mechanism, you can withdraw such consent at any time.