**MNTD App**

**Privacy Notice**

**Last Updated:** December 22, 2021

The MNTD application available on IOS and Android platforms, including the associated software, tools, information, and services available therein (the “**Application**”), is provided by MNTD PTE. LTD. (“**we**”, “**our**”, “**us**”). With respect to personal data collected within the Application we act as a data controller.

In this Privacy Notice we explain how your personal data is collected and processed. “**You**”, “**your**” refers to you as an individual using the Application. Personal data or personal information means any information directly or indirectly identifies you as an individual.

Unless otherwise defined herein, the capitalised terms used herein shall have the meanings provided in the MNTD App Terms of Service available at [link to the Terms of Service].

We make our best efforts to process personal data in accordance with the applicable data protection legislation. If you have any questions regarding processing of your personal data, do not hesitate to contact us via the contact details provided below.

1. **Contact Details**

If you have any questions about this Privacy Notice, you may contact us at legal@getmntd.com or our mailing address below.

**MNTD PTE. LTD.**

Unique Entity Number 202124287C

1 Marina boulevard #28-00

One Marina Boulevard Singapore (018989)

1. **What Information Is Collected**
2. **Wallet Address**

When you start using the Application, you must either create a Wallet or connect an existing Wallet. Therefore, in order for you to use the functionality of the Application, we process your public blockchain address associated with your Wallet (the “**Wallet Address**”).

The Wallet Address is a unique set of numbers and letters assigned to you by the Helium Blockchain Network. Please note that the Wallet Address is publicly available within the Helium Blockchain Network to any person and we retrieve it directly from the Helium Blockchain Network.

We collect and process your Wallet Address in order to allow you to connect your Wallet to the Application and associate it with your respective Hotspots. The legal basis for the processing of your Wallet Address is performance of a contract with you, i.e., to let you use the Application functionality.

We process your Wallet Address when you use the Application with your respective Wallet. Accordingly, we do not process your Wallet Address if you do not use the Application with your respective Wallet.

1. **Transactions**

Within the Application, we will process the data related to the transactions conducted with your Wallet within the Helium Blockchain Network (the “**Transactions**”).

We collect and process the Transactions in order to demonstrate to you (a) if the Wallet has sufficient balance to conduct a Transaction within the Helium Blockchain Network, and (b) the amount of the rewards from the Helium Blockchain Network earned by your Hotspots within the last 24 hours.

The legal basis for the processing of the Transactions is performance of a contract with you, i.e., to let you use the Application functionality.

Please note that the Transactions are publicly available within the Helium Blockchain Network to any person. We receive the information related to the Transactions directly from the Helium Blockchain Network.

We process the Transactions as long as you use the Application with your respective Wallet. Accordingly, we do not process the Transactions if you do not use the Application with your respective Wallet.

1. **Hotspot Address**

Each Hotspot has a unique address (identificator) assigned to it by the respective manufacturer (the “**Hotspot Address**”). The Hotspot Address is necessary for the Helium Blockchain Network to identify each Hotspot connected to it and properly maintain the interaction of the Hotspot with the Helium Blockchain Network.

When you onboard the Hotspot within the Application, the Hotspot Address is recorded in the Helium Blockchain Network. Please note that the Hotspot Address will be: (a) transferred to the Helium Blockchain Network, (b) publicly accessible by any person, and (c) processed permanently in the Helium Blockchain Network. The Hotspot Address is also automatically associated with your Wallet Address. It is not technically possible to use a Hotspot within the Application without such activities.

Please note that you may transfer the Hotspot Address to a certain other Wallet Address, in which case the Hotspot will no longer be associated with the preceding Wallet Address. If you turn off the Hotspot or cease using the Application, the Hotspot Address will still be stored within the Helium Blockchain Network and will still be associated with the respective Wallet Address.

The legal basis for the processing of the Hotspot Address is performance of a contract with you, i.e., to let you use the Application and Helium Blockchain Network functionality.

We process the Hotspot Address as long as you use the Application with your respective Wallet. Accordingly, we do not process the Hotspot Address if you do not use the Application with your respective Wallet.

1. **Location**

In order to properly onboard a Hotspot to the Application, you shall provide the location of the respective Hotspot (the “**Location**”). The Location is necessary due to the nature of the Helium Blockchain Network, which is a “proof-of-coverage” blockchain that requires to know the precise Location of each onboarded Hotspot.

You may enter the Location either manually (by personally typing the address of the Hotspot) or by using the geolocation data of your device. In the latter case, the Application will request your permission to use the geolocation data of your device; if you do not provide such permission, you will only be able to enter the Location manually.

If you use the geolocation data of your device, the Application will use the services provided by Mapbox. Such services are operated by Mapbox, Inc. registered at 740 15th Street NW, 5th Floor, Washington DC 20005, United States.

In this case, the Location may be transferred to Mapbox pursuant to this [Data Processing Agreement](https://assets.website-files.com/5d4296d7a839ea49599adba1/614b8d467b42900e0674aa14_Mapbox%20Customer%20DPA%20(Rev%2009-2021).pdf). For more information, please review [Mapbox Privacy Documentation](https://www.mapbox.com/legal/privacy). Note that competent US state authorities may have access to the personal data collected via Mapbox.

When you onboard a Hotspot, we will process the Location and associate it with the respective Hotspot Address. The Application will transfer the Location to the Helium Blockchain Network, as it is necessary for the proper functioning of the Hotspot and its interaction with the Helium Blockchain Network. Please note that the Location will be permanently available within the Helium Blockchain Network and it is literally impossible to either delete or change it. You may always update the Location, however, the previous Location will still be stored within the Helium Blockchain Network.

Please note that the Location must be associated with the address of the appropriate Hotspot, not necessarily with your personal location or location of your residence.

The legal basis for the processing of the Location is performance of a contract with you, i.e., to let you use the Application and Helium Blockchain Network functionality.

We process the Location as long as you use the Application with your respective Wallet. Accordingly, we do not process the Location if you do not use the Application with your respective Wallet. Please note that the Location will be permanently stored within the Helium Blockchain Network.

1. **Support**

You may contact us via the contact details indicated in this Privacy Notice or within the Application. When you contact us or submit a request, you may provide us with certain additional personal information. Such information may include your Discord account nickname, email address, or any other personal information that you choose to provide to us.

This data is necessary to address your issue, answer your request, contact you back, or address you properly, where and as applicable depending on the type of personal information. The legal basis for processing such data — our legitimate interest to assist you with your request regarding the Application.

If you contact us via Discord, certain personal data will be processed by Discord. Discord’s Privacy Policy is accessible at <https://discord.com/privacy>.

1. **Analytics**

When you use the Application, certain data is collected automatically. We use the Firebase Crashlytics, a solution owned by Google, Inc. registered at 1600 Amphitheatre Parkway, Mountain View, CA 09043.

The Firebase Crashlytics collects crash stack traces to help us to debug crashes. We use Firebase Crashlytics to improve the Application and ensure continuous and undisturbed work of the Application.

The Firebase Crashlytics collects the following information in case of a crush of the Application:

1. your devices details;
2. operating system of your device;
3. build’s version;
4. crash traces.

Firebase Crashlytics uses crash traces to associate crashes with the Application, send email alerts to us and display them in the Firebase Console, and help us to debug crashes. The other data is necessary for the appropriate fix of the crash. We do not intentionally associate such data with a particular user and we use it only for debugging crashes.

Note that competent US state authorities may have access to the personal data collected via Firebase Crashlytics. In addition, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking.

The legal basis for using Firebase Crashlytics and processing related data is our legitimate interest to improve our services, ensure continuous and undisturbed work of the Application, and to debug crashes within the Application.

We process the data collected by Firebase Crashlytics for ninety (90) days. Following this term, the data is permanently deleted.

1. **Wi-Fi Password**

In order to onboard a Hotspot to the Application, it is necessary to provide the Wi-Fi password of the network to which the Hotspot will be connected. The Application transfers the Wi-Fi password to the Hotspot, however, we do not store the Wi-Fi passwords.

The legal basis for the processing of the Wi-Fi password is performance of a contract with you, i.e., to let you use the Application functionality.

1. **Your Information and Blockchain**

Please kindly note that the Wallet Address, Transactions, Hotspot Address, and Location are available and used within the decentralised Helium Blockchain Network. Essentially, this data is stored within the Helium Blockchain Network. We do not control nor operate the Helium Blockchain Network. This means that due to the structure of the Helium Blockchain Network certain rights or abilities may be limited and we may not be able to influence your data on the Helium Blockchain Network. It also means that the Wallet Address, Transactions, Hotspot Address, and Location are publicly available to any person who has access to the Helium Blockchain Network. Please be aware that any transaction within the Helium Blockchain Network is irreversible and information put into the Helium Blockchain Network cannot be deleted or changed. If you do not agree with your data being processed on the Helium Blockchain Network, you should not use the Application or transact on the Helium Blockchain Network.

1. **How Your Information Is Shared**

We do not sell or rent out your personal data. However, we may share your personal data if it is reasonably necessary for the performance of our undertakings with you and our legitimate interest to maintain and develop the Application. In particular, your personal information is shared with the following categories of recipients:

1. Our affiliates if necessary due to our corporate structure.
2. Our subcontractors and team members, e.g., support team, technical team, etc.
3. Third-party solutions related to or integrated within the Application, e.g.:

* Mapbox, when you use geolocation tracking within the Application;
* Firebase, when you use the Application.

1. government institutions that may request access to your personal data.

Please note that certain data will be publicly available within the Helium Blockchain Network, as described in section “Your Information and Blockchain” above.

1. **Your Rights**

According to the applicable data protection legislation, you may have the following rights:

1. to request **access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
2. to request **correction** (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;
3. to request **erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. 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 (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law;
4. to **object** to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it 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;
5. 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: (1) if you want us to establish the data’s accuracy, (2) where our use of the data is unlawful but you do not want us to erase it, (3) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (4) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
6. 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. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Also note that the data available on the Helium Blockchain Network may be collected and structured by you at any time;
7. to **withdraw consent** at any time where we are relying on consent to process your personal data. Note that currently we do not rely on your consent to process your personal data;
8. not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you;
9. to **file a complaint** with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the applicable data protection legislation. Relevant supervisory authority will particularly depend on where you are located or where your rights were violated.

As we cannot identify you as an individual, according to the applicable data legislation, you cannot exercise your data subject’s rights, unless you provide us with additional information confirming that the data processed by us is genuinely related to you. For this reason, we may also request you to conduct certain actions (such as to conduct a blockchain transaction) to verify your identity and confirm that you have the right to exercise the data subject’s rights. For the avoidance of doubt, you cannot enforce your data subject’s rights with respect to the personal data unless we are sure that such data is associated with you. However, in any case, certain data protection rights may be limited as described below.

Please note that due to the nature of the processing operations within the Application, we may not be able to exercise certain rights that you may have pursuant to the applicable data protection legislation. When interacting with the Helium Blockchain Network we may not be able to ensure that your personal data is deleted, corrected, or restricted. This is because the Helium Blockchain Network is a public decentralised network and blockchain technology does not generally allow for data to be deleted or changed and certain rights cannot be enforced. In these circumstances, we will only be able to exercise your rights with respect to the information that is stored on our servers and not on the Helium Blockchain Network. If you want to ensure your privacy rights are not affected in any way, you should not transact on public blockchains (such as the Helium Blockchain Network) as certain rights may not be fully available or exercisable by you or us due to the technological infrastructure of the Helium Blockchain Network.

1. **Third-Party Links**

This Application may include links to third-party websites 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 applications, and are not responsible for their privacy practices. When you leave the Application, we encourage you to read the respective privacy policy/notice/statement of the website or application you visit.

1. **Children Personal Data**

The Application is not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, or solicit data from children. We do not knowingly process, collect, or use personal data of children, and in case we acknowledge that we received such data, we will, if possible, erase it within a reasonable timeframe.

1. **Changes to This Privacy Notice**

We keep this Privacy Notice under regular review and we may update it at any time. If we make any changes to this document, we will change the “Last Updated” data above. Please review this Privacy Notice regularly.

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