# **Telegram Privacy Policy**

28-35 minutes

### 1. Introduction

This Privacy Policy sets out how we, Telegram Messenger Inc. ("Telegram"), use and protect your personal data that you provide to us, or that is otherwise obtained or generated by us, in connection with your use of our cloud-based messaging services (the "Services"). For the purposes of this Privacy Policy, 'we', 'us' and 'our' refers to Telegram, and 'you' refers to you, the user of the Services.

## 1.1 Privacy Principles

Telegram has two fundamental principles when it comes to collecting and processing private data:

- We don't use your data to show you ads.
- We only store the data that Telegram needs to function as a secure and feature-rich messaging service.

### 1.2. Terms of Service

This Privacy Policy forms part of our Terms of Service, which describes the terms under which you use our Services and which are available at <a href="https://telegram.org/tos">https://telegram.org/tos</a>. This Privacy Policy should therefore be read in conjunction with those terms.

### 1.3. Table of Contents

This Privacy Policy explains the following:

- the legal basis for processing your personal data;
- what personal data we may collect from you;
- how we keep your personal data safe;
- what we may use your personal data for;
- · who your personal data may be shared with; and
- your rights regarding your personal data.

### 1.4. EEA Representative

If you live in a country in the European Economic Area (EEA), the Services are provided by Telegram, which for the purposes of applicable data protection legislation is the data controller responsible for your personal data when you use our Services. However, as Telegram is located outside the EEA, we have designated a third party, European Data Protection Office (EDPO), as our representative pursuant to Article 27 of the GDPR. You can direct to EDPO any of your GDPR-related queries:

- by using EDPO's online request form at https://edpo.com/telegram-gdpr-data-request/ or
- by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium.

# 2. Legal Ground for Processing Your Personal Data

We process your personal data on the ground that such processing is necessary to further our legitimate interests (including: (1) providing effective and innovative Services to our users; and (2) to detect, prevent or otherwise address fraud or security issues in respect of our provision of Services), unless those interests are overridden by your interest or fundamental rights and freedoms that require protections of personal data.

### 3. What Personal Data We Use

### 3.1. Basic Account Data

Telegram is a communication service. You provide your mobile number and basic account data (which may include profile name, profile picture and about information) to create a Telegram account.

To make it easier for your contacts and other people to reach you and recognize who you are, the screen name you choose, your profile pictures, and your username (should you choose to set one) on Telegram are always public. We don't want to know your real name, gender, age or what you like.

We do **not** require your screen name to be your real name. Note that users who have you in their contacts will see you by the name they saved and not by your screen name. This way your mother can have the public name 'Johnny Depp' while appearing as 'Mom' to you and as 'Boss' to her underlings at work (or the other way around, depending on how these relationships are structured).

### 3.1.1. Optional Data

You can add your birthday (with or without the year) to your Telegram profile if you wish to do so. You can granularly choose which users are able to see it on your profile (by default, your Contacts), and they will be shown a reminder on the day. We may use data about your age to determine your eligibility for accessing age-specific content.

Telegram Business subscribers can add a fixed location and a list of opening hours to their profile, to help clients identify and engage with their business more efficiently on Telegram. If you choose to add it to your profile, this information is always public.

### 3.2. Your Email Address

When you enable 2-step-verification for your account or store documents using the Telegram Passport feature, you can opt to set up a password recovery email. This address will only be used to send you a password recovery code if you forget it. That's right: no marketing or "we miss you" bullshit.

From September 2022, we may ask some users to provide an email address to receive login codes via email instead of SMS (with an option to use 'Sign in With Google' / 'Sign in with Apple'). In this case, we will receive an email address which will be stored separately from the recovery email, and will only be used to send you authentication codes when you log in to your account. The login email address will be stored until it is changed or the account is deleted.

### 3.3. Your Messages

### 3.3.1. Cloud Chats

Telegram is a cloud service. We store messages, photos, videos and documents from your *cloud chats* on our servers so that you can access your data from any of your devices anytime without having to rely on third-party backups. All data is stored heavily encrypted and the encryption keys in each case are stored in several other data centers in different jurisdictions. This way local engineers or physical intruders cannot get access to user data.

### 3.3.2. Secret Chats

Secret chats use end-to-end encryption. This means that all data is encrypted with a key that only you and the recipient know. There is **no way** for us or anybody else without direct access to your device to learn what content is being sent in those messages. We do not store your secret chats on our servers. We also do not keep any logs for messages in secret chats, so after a short period of time we no longer know who or when you messaged via secret chats. For the same reasons secret chats are not available in the cloud — you can only access those messages from the device they were sent to or from.

### 3.3.3. Media in Secret Chats

When you send photos, videos or files via secret chats, before being uploaded, each item is encrypted with a separate key, not known to the server. This key and the file's location are then encrypted again, this time with the secret chat's key — and sent to your recipient. They can then download and decipher the file. This means that the file is technically on one of Telegram's servers, but it looks like a piece of random indecipherable garbage to everyone except for you and the recipient. We don't know what this random data stands for and we have no idea which particular chat it belongs to. We periodically purge this random data from our servers to save disk space.

### 3.3.4. Public Chats

In addition to private messages, Telegram also supports public channels and public groups. All public chats are cloud chats (see section 3.3.1 above). Like everything on Telegram, the data you post in public communities is encrypted, both in storage and in transit — but everything you post in public will be accessible to everyone.

### 3.3.5. Paid Posts

As of June 2024, creators are able to offer paid access to specific channel posts by accepting Telegram Stars. When users pay to unlock a channel post, a permanent copy is created which resides in the parties' transaction history. This copy remains accessible even if the post is later deleted or either party loses access to the channel.

#### 3.4. Phone Number and Contacts

Telegram uses phone numbers as unique identifiers so that it is easy for you to switch from SMS and other messaging apps and retain your social graph. We ask your permission before syncing your contacts.

We store your up-to-date contacts in order to notify you as soon as one of your contacts signs up for Telegram and to properly display names in notifications. We only need the number and name (first and last) for this to work and store no other data about your contacts.

Our automatic algorithms can also use anonymized sets of phone numbers to calculate the approximate number of potential contacts an unregistered phone number may have on Telegram. When you open the 'Invite friends' interface, we display the resulting statistics next to your contacts to give you an idea of who could benefit most from joining Telegram.

You can always stop syncing contacts or delete them from our servers in Settings > Privacy & Security > Data Settings.

If you are using Android, Telegram will ask you for permission to access your phone call logs (READ\_CALL\_LOG). If you grant this permission, Telegram will be able verify your account by transmitting a phone call instead of asking you to enter a code. Telegram uses this permission only to confirm receipt of the confirmation call by verifying the number in the call log.

### 3.5. Location Data

If you share a location in a chat, this location data is treated like other messages in cloud or secret chats respectively.

If you share your Live Location in any chat or turn on 'Make Myself Visible' in People Nearby, Telegram will use your data to display your location to those users with whom you are sharing it, even when the app is closed – for as long as you keep these optional features activated.

### 3.6. Cookies

The only cookies we use are those to operate and provide our Services on the web. We do not use cookies for profiling or advertising. The cookies we use are small text files that allow us to provide and customize our Services, and in doing so provide you with an enhanced user experience. Your browser should allow you to control these cookies, including whether or not to accept them and how to remove them. You may choose to block cookies with your web browser, however, if you do disable these cookies you will not be able to log in to Telegram Web.

# 4. Keeping Your Personal Data Safe

## 4.1. Storing Data

If you signed up for Telegram from the UK or the EEA, your data is stored in data centers in the Netherlands. These are third-party provided data centers in which Telegram rents a designated space. However, the servers and networks that sit inside these data centers and on which your personal data is stored are owned by Telegram. As such, we do not share your personal data with such data centers. All data is stored heavily encrypted so that local Telegram engineers or physical intruders cannot get access.

### 4.2. End-to-End Encrypted Data

Your messages, media and files from secret chats (see section 3.3.2 above), as well as the contents of your calls and the data you store in your Telegram Passport are processed only on your device and on the device of your recipient. Before this data reaches our servers, it is encrypted with a key known only to you and the recipient. While Telegram servers will handle this end-to-end encrypted data to deliver it to the recipient – or store it in the case of Telegram Passport data, we have no ways of deciphering the actual information. In this case, we neither store nor process your personal data, rather we store and process random sequences of symbols that have no meaning without the keys which we don't have.

### 4.3. Retention

Unless stated otherwise in this Privacy Policy, the personal data that you provide us will only be stored for as long as it is necessary for us to fulfill our obligations in respect of the provision of the Services.

## 5. Processing Your Personal Data

### 5.1. Our Services

Telegram is a cloud service. We will process your data to deliver your cloud chat history, including messages, media and files, to any devices of your choosing without a need for you to use third-party backups or cloud storage.

### 5.2. Safety and Security

Telegram supports massive communities which we have to police against abuse and Terms of Service violations. Telegram also has more than 900 million users which makes it a lucrative target for spammers. To improve the security of your account, as well as to prevent spam, abuse, and other violations of our Terms of Service, we may collect metadata such as your IP address, devices and Telegram apps you've used, history of username changes, etc. If collected, this metadata can be kept for 12 months maximum.

### 5.3. Spam and Abuse

To prevent phishing, spam and other kinds of abuse and violations of Telegram's Terms of Service, our moderators may check messages that were reported to them by their recipients. If a spam report on a message you sent is confirmed by our moderators, your account may be limited from contacting strangers – temporarily or permanently. You can send an appeal using @Spambot. In case of more serious violations, your account may be banned. We may also use automated algorithms to analyze messages in cloud chats to stop spam and phishing.

## 5.4. Cross-Device Functionality

We may also store some aggregated metadata to create Telegram features (see section 5.5 below) that work across all your devices.

### 5.5. Advanced features

We may use some aggregated data about how you use Telegram to build useful features. For example, when you open the Search menu, Telegram displays the people you are more likely to message in a box at the top of the screen. To do this, we calculate a rating that shows which people you message frequently. A similar rating is calculated for inline bots so that the app can suggest the bots you are most likely to use in the attachment menu (or when you start a new message with "@"). To turn this feature off and delete the relevant data, go to Settings > Privacy & Security > Data Settings and disable "Suggest Frequent Contacts".

## 5.6. No Ads Based on User Data

Unlike other services, we don't use your data for ad targeting or other commercial purposes. Telegram only stores the information it needs to function as a secure and feature-rich cloud service.

Telegram offers a tool for advertisers to promote their messages in public one-to-many channels, but these sponsored messages are based solely on the topic of the public channels in which they are shown. No user data is mined or analyzed to display ads or sponsored messages.

## 6. Bot Messages

## 6.1. Ecosystem

Telegram has an API that allows third-party developers to create bots. Bots are apps that look like special Telegram users: you can talk to them from your chat list, add them to groups or use a special "inline" interface to access their features. By performing any of these actions, you will be sending some of your data to the respective third-party bot developers.

### 6.2. How Bots Can Receive Data

You can send data to bot developers when you interact with their bots in one of these ways:

- · By sending messages to a bot.
- By using an inline bot.
- By participating in a group with a bot.
- By pressing buttons in messages sent by a bot.
- By paying for goods and services via bots (see section 7 below).
- By sending a join request to a group or channel.
- By using Telegram Business features that connect a chatbot to your account.
- By opening a chat with a Telegram Business account controlled by a chatbot (see section 6.5 below).

### 6.3. What Data Bots Receive

In any of the above cases, the developers of an automated user (bot) can get your public account data (see section 3.1 above): your screen name, username and profile picture(s).

Bots can also receive the following data when you **interact** with them.

- Bots will obviously get your messages when you send them something.
- If you click on links or buttons provided by the bot, the bot can potentially get your IP address (provided that it controls the website to which the link leads).
- If the bot is a member of the same group with you, it may know you are a member.
- When you start your message with the username of an inline bot (e.g. @gif) the interface transforms so that everything you type becomes a query to that bot. This query is sent to the bot so that it can provide its service. We will warn you about this the first time you use an inline bot.
- Bots added to groups can operate in two modes: with access to messages in the group or without access. If the bot has access to messages, it can see everything that happens in the group. The interface clearly shows whether or not a bot has access to messages in groups.
- To facilitate text localization, bots you interact with (including via chats managed by Telegram Business
  Chatbots), may receive your interface language based on your app or operating system language settings.
  Note that if you update your language settings, bots may continue to receive your previous language for some time.

### 6.4. Bots Are Not Maintained by Telegram

Other than our own bots, no other bots or third-party bot developers are affiliated with Telegram. They are completely independent from us. They should ask you for your permission before they access your data or you make it available to them.

### 6.5. Telegram Business Chatbots

Telegram Business subscribers can connect third-party bots to their Telegram account, to help them automatically process and respond to messages from users.

## 6.5.1. Communicating with a Business Chatbot

Telegram users have been able to communicate with bots, including bots run by businesses, since 2015. With the introduction of Telegram Business, users can also seamlessly interface with bots in private chats with Telegram Business users who have connected a chatbot to their account.

If you message a Business user who connected a chatbot to their account, depending on their settings, you may be effectively communicating with a bot, and it will receive basic data about you as detailed in section 6.3 above.

# 6.5.2. Using a Business Chatbot to Manage Your Chats

If you connect a third-party bot to your account via Telegram Business, the bot will have access to basic information about your account (see section 6.3 above), and will be able to message you privately. Additionally, the bot will have access to all messages, media and files contained in the private chats you allow it to manage. Lastly, if you grant it permission to do so (and only in the private chats you assigned to it), the bot will be able to send messages and perform other actions on your behalf.

You can alter or revoke the bot's permissions, including the list of chats it can access, at any time from Settings > Telegram Business > Chatbots on official Telegram clients.

# 7. Third Party Payment Services

# 7.1. Payment Information

The Payment Platform for Bots is available to users as of Telegram 4.0. Telegram does not process payments from users and instead relies on different payment providers around the world. It is the payment providers that handle and store your credit card details. Neither Telegram nor the merchants on the platform (bot developers) have access to this information. Although we work with payment providers they are completely independent from Telegram. Please study their relevant privacy policies before making your data available to them.

### 7.2. Credit Card Information

When making a purchase, you enter your credit card details into a form supplied by the payment provider that will be processing the payment, and this information goes directly to the payment provider's server. Your credit card information never reaches Telegram's servers. We do not access and do not store your credit card information. When you save your credit card info, it is saved on the respective payment provider's servers and the payment provider gives Telegram a *token* that you can reuse for future payments. It is not possible to reconstruct your credit card info from the token.

## 7.3 Shipping Information

When you enter shipping information in the process of placing an order, we send it directly to the merchant bot developer. We can store your shipping information for you if you choose to save it for future purchases. We will delete this information immediately if you ask us to.

## 7.4. Clearing Payment Information

You can clear all payment information associated with your account at any time by going to Telegram Settings > Privacy & Security > Data Settings and selecting 'Clear Payment & Shipping Info'. If you choose to remove your payment information, we will delete your stored shipping info and payment tokens from all providers and ask the payment providers to remove your credit card information that they store.

# 7.5. Payment Disputes

Due to the fact that Telegram doesn't store any credit card details or transaction information, it is impossible for us to handle complaints or cashbacks – any disputed payments are the responsibility of the bot developers, payment providers, and banks that participated in the exchange.

# 8. Who Your Personal Data May Be Shared With

### 8.1. Other Telegram Users

Other users of our Services with whom you choose to communicate with and share certain information, who may be located outside the EEA. Note that by entering into the Terms of Service and choosing to communicate with such other users of Telegram, you are instructing us to transfer your personal data, on your behalf, to those users in accordance with this Privacy Policy. We employ all appropriate technical and organizational measures (including encryption of your personal data) to ensure a level of security for your personal data that is appropriate to the risk. However, note that if you chat with others and share data with them, they become capable of sharing such data further with third parties without your knowledge or consent, and Telegram has no way to prevent this.

### 8.2. Telegram's Group Companies

To provide, improve and support our Services, we may share your personal data with: (1) our parent company, Telegram Group Inc, located in the British Virgin Islands, (2) Telegraph Inc., a group member also located in the BVI; and (3) Telegram FZ-LLC, a group member located in Dubai. We will implement appropriate safeguards to protect the security and integrity of that personal data. This will take the form of standard contract clauses approved by the European Commission in an agreement between us and our relevant group companies. If you would like more information regarding these clauses, please contact our EEA representative using the details in section 1.4 above.

## 8.3. Law Enforcement Authorities

If Telegram receives a valid order from the relevant judicial authorities that confirms you're a suspect in a case involving criminal activities that violate the Telegram Terms of Service, we will perform a legal analysis of the request and may disclose your IP address and phone number to the relevant authorities. If any data is shared, we will include such occurrences in a quarterly transparency report published at: https://t.me/transparency.

## 8.4. Translation of Chats, Channels and specific Messages at the Request of the User

Users can choose to translate a specific text message into a different language by tapping "Translate" in the action menu of the message (to enable this option, a user should first turn on Translation services in the Settings > Languages section of the Telegram application). Telegram Premium users can also optionally enable automatic live translation on any chat, group or channel.

Since Telegram may rely on a third-party, Google LLC, subsidiary of Alphabet Inc, for automatic translation of messages, the text of any message or set of messages that users choose to translate may be shared with Google in order to obtain their translated versions. Google will only access the data to provide a translation and will not use it for any other Google products, services, or advertising.

## 8.5. Transcription of Voice and Video Messages at the Request of the User

Some users can choose to convert a voice or video message to text by tapping on the Voice-to-Text icon ("->A") displayed on eligible messages (to be able to use this option, users should subscribe to Telegram Premium in the Settings > Telegram Premium section of the Telegram application).

Since Telegram may rely on a third party, Google LLC, subsidiary of Alphabet Inc, for voice-to-text conversion, the **audio data** of voice and video messages that users choose to convert to text may be shared with Google in order to obtain their transcribed versions. Only audio data may be shared for this purpose (no other data, such as the user's IP address or any information about their account is shared). According to the agreement between Telegram and Google, Telegram will pay for the transcriptions on behalf of its users and Google will only access the audio data to provide a transcribed version – it will not log audio data or transcripts, and will not use the data for any other Google products, services, or advertising.

# 9. Your Rights Regarding the Personal Data You Provide to Us

### 9.1. Your Rights

Under applicable data protection legislation, in certain circumstances, you have rights concerning your personal data. You have a right to: (1) request a copy of all your personal data that we store and to transmit that copy to another data controller; (2) delete (see section 10 below) or amend your personal data; (3) restrict, or object to, the processing of your personal data; (4) correct any inaccurate or incomplete personal data we hold on you; and (5) lodge a complaint with national data protection authorities regarding our processing of your personal data.

### 9.2. Exercising Your Rights

If you wish to exercise any of these rights, kindly use the contact details in section 12 below.

### 9.3. Data Settings

You can control how your data is used (e.g., delete synced contacts) in Settings > Privacy & Security > Data Settings (using one of our mobile apps).

Sadly, if you're not OK with Telegram's modest minimum requirements, it won't be possible for us to provide you with our Services. You can delete your Telegram account by proceeding to the deactivation page.

# 10. Deleting data

### 10.1. Accounts

If you would like to delete your account, you can do this on the deactivation page. Deleting your account removes all messages, media, contacts and every other piece of data you store in the Telegram cloud. This action must be confirmed via your Telegram account and cannot be undone.

### 10.2. Messages

- In secret chats, deleting a message always instructs the app on the other end to delete it too.
- In cloud chats, you can choose to delete a message for all participants within at least 48 hours after sending.
   Otherwise, deleting a message will delete it from your message history. This means that a copy will stay on the server as part of your partner's message history. As soon as your partner deletes it too, it's gone forever.
- As of version 5.5, any party can choose to delete any messages in one-on-one chats, both sent and received, for both sides. There is no time limit. Any party can also opt to clear the entire chat history for both parties, in which case the apps will be instructed to remove all messages in that chat, regardless of how many messages are retained by either of the participants.
- In supergroups and channels, deleting a message removes it for all participants. Note that deleted messages and original versions of edited messages from supergroups are stored for 48 hours after deletion in order to be shown in admins' Recent Actions panel. For paid posts in channels, see 3.3.5.

## 10.3. Self-Destructing Messages

Messages in Secret Chats can be ordered to self-destruct. As soon as such a message is read (2 checks appear), the countdown starts. When the timer expires, both devices participating in a secret chat are instructed to delete the message (photo, video, etc.). Media with short timers (less than a minute) are shown with blurred previews. The timer is triggered when they are viewed.

### 10.4. Account Self-Destruction

By default, if you stop using Telegram and do not come online for at least 6 months, your account will be deleted along with all messages, media, contacts and every other piece of data you store in the Telegram cloud. You can go to Settings to change the exact period after which your inactive account will self-destruct.

## 11. Changes to this Privacy Policy

We will review and may update this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on this page <a href="https://www.telegram.org/privacy">www.telegram.org/privacy</a>. Please check our website frequently to see any updates or changes to our Privacy Policy, a summary of which we will set out below.

### March 25, 2019

• Expanded 10.2. Deleting Messages with data on the new features in version 5.5, which allow both participants to remove any messages from one-on-one chats for both sides without a time limit.

### March 24, 2021

- Added 3.5. Location Data.
- Improved structure, moving 3.3.5 to 3.4 and 3.3.6 to 3.6.

### October 26, 2021

Expanded 5.6. No Ads Based on User Data with information about sponsored messages in public channels.

# June 19, 2022

• Added 8.4. Translation of Messages at the Request of the User and 8.5. Transcription of Voice Messages at the Request of the User.

### September 8, 2022

• Expanded 3.2. Your Email Address with information on login emails.

## **February 3, 2022**

• Updated 8.4 and 8.5 to reflect the new premium feature that allows translating entire chats.

### **April 24, 2023**

- Updated 1.4. 9.2 and 12 to update the details of Telegram's EEA representative for GDPR matters.
- Updated 8.2 to mention Telegraph Inc., a member of the Telegram group of companies.

## March 31, 2024

Added 3.1.1. Optional Data.

Added information about Telegram Buisness chatbots to the Bot Messages section (6.2, 6.3, 6.5).

Important changes made to this Privacy Policy will be notified to you via Telegram.

## 12. Further Information

If you have any questions please feel free to explore our FAQ or contact Telegram's Volunteer Support in-app via Settings > Ask a Question.

If you live in the EU and would like to submit a GDPR-related request, please see here.

Telegram is an open source project. You can find more information on our:

- API at: https://core.telegram.org/api;
- Bot Platform at: https://core.telegram.org/bots;
- Protocol at: https://core.telegram.org/mtproto; and
- Source Code at: https://telegram.org/apps#source-code.
- Confirm that Telegram apps downloaded from app stores are using the same code that we publish at: https://core.telegram.org/reproducible-builds