

Gleipner Wallet Privacy Policy

Last Updated: July 17, 2021

Introduction

Welcome to Gleipner Wallet, a free, tool for interacting with the Gleipner blockchain.

The Gleipner Wallet is a hierarchical deterministic mobile application (the App) interacting with the Gleipner blockchain (the "blockchain") distributed by Gleipner Network ApS ("Gleipner Network" or "we" or "us" or "our") which allows users to broadcast messages & transactions and view these through the App along with other information. This Privacy Policy ("Privacy Policy") helps explain how we collect, use, store, and protect your information when you use the App, or our service at Gleipner.io (collectively the "Services").

A hierarchical deterministic wallet does not require entering any personal information to use the App, as such "personal" can be understood as "individual". We will not necessarily have any "personal" information about you, but we will have "individual" information relating to the public blockchain address generated by the App. When reading the word personal below this could be replaced with individual.

The Blockchain

Due to the inherent transparency of the Gleipner blockchain, transactions that individuals broadcast via the Gleipner Wallet may be publicly accessible via e.g. <https://explorer.gleipner.io/>. This includes, but is not limited to, your public sending address, the public address of the receiver, the number of tokens sent or received, and any other data a user has chosen to include in a given transaction. Information stored on a blockchain may be public, immutable, and difficult or even impossible to remove or delete. Transactions and addresses may reveal information about the user's identity and information can potentially be correlated now or in the future by any party who chooses to do so, including law enforcement. Users are encouraged to review how privacy and transparency on the blockchain works.

Information We Collect

We receive or collect information when we operate and provide our Services, including when you install, access, or use our Services.

Information you provide:

- **Your Transactions** - Transactions on the blockchain, which are public and immutable, are stored so that the App can be supported with transaction history.
- **Your selected language and currency**
We may collect information about the language and currency chosen in the App in order to use this information to further improve services.
- **Customer Support** - We may collect additional information which you may disclose to our customer support team.

Automatically collected information:

- **Device and Connection Information** - We may collect device-specific information when you install, access, or use our Services. This may include your IP address.
- **Status Information** - We may collect information about your online status on our Services, such as e.g. when you last used our Services (your “last seen status”).

How We Use the Information We Collect

Our primary purpose in collecting information is to help us operate, provide, improve, customize, support, and market our Services. We may use your information to:

- Provide the Services and customer support you request;
- Resolve issues and troubleshoot problems;
- Prevent and investigate potentially prohibited or illegal activities;
- Customize, measure, and improve the Services and the content and layout of our application; and
- Deliver targeted marketing and service update notices.

We will not use your information for purposes other than those disclosed to you, without your permission.

Marketing

We will never sell or rent your information to third parties.

Any communications we send to you will either be related to your use of the App or related to the Services.

We do not allow third-party banner ads on Gleipner Wallet, but if we ever do, we will update this policy.

Do Not Track Disclosures

None of our services track users over time and across third party websites to provide targeted advertising and therefore do not respond to Do Not Track (DNT) signals.

How we share Information with Third Parties

We work with third-party providers to help us operate, provide, improve, customize, support, and market our Services. For example, we work with companies to distribute our apps, provide our infrastructure, delivery, and other systems. These providers may provide us information about you in certain circumstances; for example, app stores may provide us reports to help us diagnose and fix service issues.

We may also share information with law enforcement, government officials, or other third parties when:

- We are compelled to do so by a subpoena, court order, or similar legal procedure; or

- We believe in good faith that the disclosure of information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our Terms.

Finally, we may share information with companies or other entities that we plan to merge with or are being acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policy.

How we use Cookies

When you access our Services, we may place small data files called cookies or pixel tags on your computer or mobile device.

We use these files to understand, secure, operate, and provide our Services. For example, we use cookies to:

- Improve your experience, and understand how our Services are being used;
- Measure the effectiveness of our promotions; and
- Remember your choices and customize our Services for you

You can follow the instructions provided by your browser or device (usually located under “Settings” or “Preferences”) to modify your cookie settings. Please note that if you set your browser or device to disable cookies, certain of our Services may not function properly.

Security of your Personal/Individual Information & Rights

We are committed to protecting the security of Personal Information. We have taken certain physical, administrative, and technical steps to help safeguard the information we collect from and about you. While we take steps to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures.

In certain circumstances, you will also have the following rights:

1. Right to access: the right to request certain information about, access to and copies of any Personal Information about you that we are holding (please note that you are entitled to request one copy of the Personal Information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs);
2. Right to rectification: the right to have your Personal Information rectified if it is inaccurate or incomplete;
3. Right to restriction of use of your information: the right to stop us from using your Personal Information or limit the way in which we can use it;
4. Right to object: the right to object to our use of your Personal Information including where we use it for our legitimate interests.

Requests in relation to the above, requires that you provide full information about your identity, and should be sent to: datarequest@gleipner.io

Our Global Operations

You agree to our information practices, including the collection, use, processing and sharing of your information as described in this Privacy Policy, as well as the transfer of your information to and processing in Denmark, and other countries globally where we have or use facilities, service providers, or partners, regardless of where you use our Services.

You acknowledge that the laws, regulations, and standards of the country in which your information is stored or processed may be different from those of your own country. However, we require our service providers to treat your information in strict confidence and use appropriate security measures to protect it. We also require them to uphold all obligations under this Privacy Policy.

Updates to Our Policy

We may amend or update our Privacy Policy from time to time. We will notify you of material changes to this policy by updating the last updated date at the top of this page, and we will provide you with explicit notice of material changes as required by law. Your continued use of our Services confirms your acceptance of our Privacy Policy, as amended. If you do not agree to our Privacy Policy, as amended, you must stop using our Services. We recommend that you visit this page frequently to check for changes.

Contact Us

If you have any questions about our Privacy Policy, please do not hesitate to contact us at privacypolicy@gleipner.io