

# PRIVACY NOTICE

Last updated July 24, 2024

As a data controller, Clave Technologies Ltd (“**Clave**”, “**we**” our “**us**”), gives the utmost importance to the lawfulness of processing of personal data. This privacy notice (“**Privacy Notice**”) describes how and why we might collect, store, use, and/or share your personal information when you use our services (“**Services**”) via our Website <https://www.getclave.io> (“**Site**”) and Application (“**App**”).

At Clave, we prioritize your privacy by minimizing the data we process. In alignment with our core principles, we understand the importance of maintaining anonymity. We encourage you to share only the information necessary for using our Services effectively. The extent of the data you choose to disclose rests solely in your actions and interactions on our Services.

This approach not only supports our commitment to your privacy but also reinforces our promise to provide a secure and transparent environment. We design our data usage policies to ensure they align with these principles, offering you control over your personal information while fostering trust and integrity.

## SUMMARY OF KEY POINTS

*This summary highlights key points from our Privacy Notice. You can find out more details about any of these topics by clicking the link below.*

### What personal information do we process?

- We collect personal information based on how you interact with our Services, the choices you make, and the features you use. [Learn more.](#)
- Clave does not store personally identifiable information such as your first or last name, ensuring your anonymity is maintained.
- If you choose to provide your email address optionally, it will be used solely for your account security and product updates. We do not link it to any other personal data collected by Clave.
- We collect public, non-identifiable on-chain data related to assets held in wallets and transaction details to improve the Services provided through our App.
- To improve our Service and products, we collect non-identifiable technical data such as device type, browser version, and IP address. This information is used purely for analytical purposes and not for tracking users. [Learn more.](#)

### How do we keep your information safe?

At Clave, safeguarding your personal information is paramount. We implement organizational and technical measures designed specifically to protect your data from unauthorized access and potential threats. If you prefer enhanced privacy, we recommend not using social networks for communications. Additionally, opting out of App usage analytics can help minimize the collection of your usage data, further enhancing your privacy. These options are part of our commitment to maintaining a secure and transparent environment where your privacy is always a top priority.

## WHAT INFORMATION DO WE COLLECT?

The personal information we collect about you depends on the particular activities carried out through our Site and App.

### When You Browse Our [Site](#):

We may automatically collect your certain information, including:

- **Browser and Device Information:** such as the type and version of the browser or device, certain browser settings like language, time, time zone, and location (city, country).
- **Usage information:** information about activity on the digital content visited, such as visited pages, searches, or links clicked.

### When You Use Our [App and Services](#):

You may provide us with certain information, including:

- **Account Information:** Your public wallet address, email (optional) and username (optional), photo (optional). Other users can view your profile, including your photo, within the app, fostering a more interactive community. If you prefer to maintain complete privacy, we recommend not providing optional information such as your username or photo.

We may automatically collect your certain information, including:

- **Device Information:** such as the type and version of the device,, certain device settings like language, time, time zone, and Internet Protocol (IP) address.
- **Usage information:** information about activity on the digital content viewed, features accessed, such as visited pages, searches, or links clicked.
- **Push token:** We rely on the push notification systems of your device, such as iOS and Android, to send you notifications related to your wallet activities and security. These push tokens (device tokens) do not carry any personal information but are used solely to direct notifications to devices that have our wallet software installed. This ensures that important information about your wallet is securely and directly delivered to your device.

Anyone who wishes to completely avoid the processing of push token data can disable push notifications for the app in the Settings section of their device. Therefore, we are unable to process your push token identity that is generated based on your device information.

- **Transaction Information:** The information contains data about the type of transaction, amount, assets, and other transaction metadata.

We may collect your information from other sources, including:

- **Publicly available Blockchain Data:** We collect publicly available blockchain data, including details of transactions, assets held in your wallet, and other relevant information. This is essential to accurately reflect the activity in your wallet and ensure the security of your operations within the blockchain network. This data helps us maintain the integrity and reliability of our app by providing real-time, accurate information directly to your device.

## HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for various purposes, which vary based on your interactions with our Services. To ensure transparency and enhance understanding, we have categorized the types of data collected through our Site and App.

### Personal Data Collected During Your Use of Our Site

PURPOSE	PERSONAL DATA CATEGORIES	LEGAL BASIS
Provision and Maintenance of Services	<ul style="list-style-type: none"> <li>● Browser and Device Information</li> <li>● Usage Information</li> </ul>	Legitimate Interest - Accessing the Site on Your Device

## Personal Data Collected During Your Use of Our App

PURPOSE	PERSONAL DATA CATEGORIES	LEGAL BASIS
Provision and Maintenance of Services (Monitoring service usage, ensuring service continuity)	<ul style="list-style-type: none"> <li>Device Information</li> <li>Blockchain Data</li> <li>User Interactions</li> </ul>	Legitimate Business Interest - Secure Interface Performance
Account Management (Processing information for account creation, login, and maintenance)	<ul style="list-style-type: none"> <li>Log Information</li> <li>Wallet Information</li> </ul>	Our Obligation to Fulfill The Contract with You
Sending / Receiving Digital Assets	<ul style="list-style-type: none"> <li>Wallet Information</li> <li>Transaction Information</li> </ul>	Our Obligation to Fulfill The Contract with You
Commence / Sign Transactions via Decentralized Applications	<ul style="list-style-type: none"> <li>Log Information</li> <li>Wallet Information</li> <li>Transaction Information</li> </ul>	Our Obligation to Fulfill The Contract with You
Electronic Communication (Contacting you regarding products or services, changes to our terms and policies, and other similar information)	<ul style="list-style-type: none"> <li>E-mail</li> </ul>	Legitimate Interest – Providing Essential Updates for Products and Services.
Creating a more engaging and personalized user experience. <i>(Other users can view your profile within the app, fostering a more interactive community.)</i>	<ul style="list-style-type: none"> <li>Photo</li> </ul>	Legitimate Interests - Enhancing user engagement and interaction on our App, improving the user experience, and creating a connected community.
Product and Services updates via app notifications	<ul style="list-style-type: none"> <li>E-Mail</li> <li>Push Token (Device Token)</li> </ul>	User's consent

### HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with service providers who perform services for us or on our behalf and require access to such information to do that work. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Notice. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services (Amazon Web Services Inc.)
- Data Storage Service Provider (Amazon Web Services Inc.)
- Data Analytics Services (Google Analytics)
- Application Log Storage Service (Sentry Inc)

Photos you upload to your profile may be visible to other users within the app to foster a more interactive community. If you prefer to maintain complete privacy, please do not upload a photo to your profile.

## **HOW WE TRANSFER INFORMATION INTERNATIONALLY**

We want to make sure that your personal data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the UK / European Economic Area (EEA) where it is in line with applicable law, and we will require that there is an adequate level of protection for your personal data, and that appropriate security measures are in place.

Our main external third-party service provider for data storage and processing is Amazon Web Services (AWS). As a global company, AWS may transfer and store your personal data outside of the UK as part of its cloud infrastructure services. We have implemented appropriate safeguards and contractual measures, to ensure the security and protection of your personal data during international transfers in accordance with applicable data protection laws.

## **USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES**

A cookie is a small text file placed onto your device (such as a computer, smartphone, or other electronic device) when you use our Site. Some device data, service data and third-party source data are collected through the use of first or third-party cookies and similar technologies.

For more details regarding cookies and similar technologies, our usage of cookies and instructions on how to disable them, please refer to our [Cookie Notice](#).

## **INFORMATION SHARING WITH THIRD PARTIES**

We do not have control over third-party websites or platforms, and they are not governed by this Privacy Notice. If you visit third-party sites through the links we provide, the operators of those sites may collect information from you according to their own privacy policies. Before providing any personal data to those websites, please review their privacy policies. We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services.

## **HOW WE PROTECT YOUR INFORMATION**

We have implemented appropriate technical and organizational security measures designed to protect your personal data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We protect your personal data from potential security breaches by implementing specific technological security measures, including encryption, firewalls, and secure socket layer technology. We update and test our security standards on an ongoing basis.

In addition, we take reasonable steps to assure that third parties to whom we transfer your personal data provide sufficient protection of personal data.

## **DATA RETENTION**

We will not retain your personal information longer than necessary to fulfil the purposes for which the data was collected or to fulfil our legal obligations or necessary for the establishment, exercise of defence of legal claims or resolving disputes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **INFORMATION COLLECTED FROM MINORS**

Our Services are intended for general audiences and are not designed to attract children under the age of 17. We do not collect personal information from children under 17 without parental consent. If such information is inadvertently collected, it is promptly deleted and the child, along with their parent or guardian, is notified that they are not allowed to use the Services. Our app is rated 17+ on the App Store, reinforcing our commitment to age-appropriate use. If you believe that a minor under the age of 17 use our Services, please [contact our support team](#). We consistently update our policies to enhance user safety and privacy.

## YOUR PRIVACY RIGHTS

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your account. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you, you can:

- **Access Your Data:** You can request more information about the personal data we hold about you and ask us for a copy of such personal data.
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your personal data we are holding about you in certain cases, particularly if it's inaccurate or incomplete.
- **Object to Use of Data:** You can contact us to let us know that you object to the further use or disclosure of your personal data for certain purposes.
- **Limit or Restrict to Use of Data:** You can ask us to restrict further processing of your personal data.
- **Data Portability:** You can ask us for a copy of your personal data you provided in a machine-readable form. You can also request that we transmit the data to another controller where it is technically feasible.
- **Delete Data:** You can ask us to erase or delete all or some of your personal data from our systems (e.g., if it is no longer necessary to provide Services to you).

## DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. We do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

## HOW TO REVIEW, UPDATE, OR DELETE YOUR DATA

You have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please fill out and submit a data subject access request.

We will need to verify your identity to process your information/know, access, correction, and deletion requests. To verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems.

Although we try to limit personal data collected in connection with a request to exercise your rights, certain requests may require us to obtain additional personal data from you. In certain circumstances, we may decline a request to exercise the right to know and the right to deletion, particularly where we are unable to verify your identity.

If you would like to exercise any of those rights, please email, call or write to us—see below: 'How to contact us'. When contacting us please:

- provide enough information to identify yourself and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

Please contact us if you have any queries or concerns about our use of your personal data (see below '[How to contact us](#)'). We hope we will be able to resolve any issues you may have.

## UPDATES TO PRIVACY NOTICE

***In Short:*** Yes, we will update this Privacy Notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

## HOW TO CONTACT US

If you have questions or comments about Privacy Notice, you may contact us by post at:

- **Physical Address:** 5 Beaufort Court, Admirals Way, London, United Kingdom, E14 9X
- **Email Address:** [[privacy@clave.team](mailto:privacy@clave.team)]

If you are a resident in the European Economic Area, we are the 'data controller' of your personal information. We have appointed Baki Er to be our representative in the EEA. You can contact them directly regarding our processing of your information, by email at [[privacy@clave.team](mailto:privacy@clave.team)], or by post to: [An der Tiefenriede 17, 30173 Hannover, Germany]