

# WHITEWALLET PRIVACY POLICY

## I. GENERAL INFORMATION

This Privacy Policy ("**Privacy Policy**") governs the collection, processing, use, and disclosure of your Personal Data by **Clear White Solutions Limited** a company registered under the laws of the British Virgin Islands (also referred to as: "**We**," "**Us**," or "**Our**"). This Privacy Policy applies when you access or use Whitewallet or any of its Services.

Whitewallet (hereinafter - "**Wallet**" or "**Whitewallet**") is a non-custodial wallet software for digital assets including cryptocurrencies, which implies the full ownership and control of the assets along with the responsibility of storing and securing the Seed phrase solely by the Wallet owner. Upon using Whitewallet you may generate new or import compatible wallets generated by other (third-party) wallet tools/providers, store and manage your Digital assets, execute transactions as well as perform other actions or use other **Services** thoroughly described in Whitewallet Terms and Conditions.

By using Whitewallet, you signify your agreement to both this Policy and the Whitewallet [Terms and Conditions](#). The definitions included therein shall also apply to this Privacy Policy.

We take user privacy seriously, therefore, We are committed to processing your Personal Data in a confidential manner and in strict compliance with all applicable laws and regulations.

This Privacy Policy aligns with the EU General Data Protection Regulation (GDPR), California Consumers Protection Act 2018 (CCPA), the Directive on Privacy and Electronic Communications (ePrivacy Directive), and other applicable data protection laws ("**Data Protection Regulation**"). Furthermore, the Privacy Policy adheres to all other relevant and generally binding legal regulations concerning the processing of personal data within the European Economic Area (EEA).

To prevent any misunderstandings, the term "**Personal Data**" refers to any information pertaining to an identified or identifiable person who can be identified, directly or indirectly, in particular by reference to identifiers like the person's: full name, email, and online identifiers, like IP addresses, unique devices ID etc.

This Privacy Policy sets the legal frames of collection, storage, usage, maintenance, disclosure, and elimination ("**Processing**") of the Personal Data that is received and collected by Us. Processing means any operation or set of operations that is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction. In practical terms, this means any process that stores or consults Personal Data is considered processing.

This Privacy Policy helps to explain how We collect, use, store, and protect your information in the course of using Whitewallet Services or any other related websites, pages, features, or content and indicates the privacy rights of the users.

Your use of Whitewallet Services, including downloading the Whitewallet application ("**Application**") that grants access to such Services or contacting us for customer or technical support via email constitutes your express consent to the collection and use of your Personal Data in accordance with this Privacy Policy.

We presume you have carefully reviewed and fully understand this Privacy Policy. By using Whitewallet Services, you implicitly agree to its terms. Should you disagree with any portion of this Policy, you are obligated to refrain from using Whitewallet and discontinue use immediately.

We reserve the right to modify this Privacy Policy to reflect any changes in our information collection, use, and storage practices. You have the ongoing responsibility to periodically review this Policy for any changes, or updates before starting utilizing Whitewallet or any of its Services.

## II. TYPES OF COLLECTED DATA

We collect your Personal Data primarily to enable you to utilize Whitewallet Services. This information is essential and necessary for Us to be able to provide the Services, comply with applicable laws and regulations, and develop and improve our Service offerings.

We strive to collect only the minimum amount of Personal Data necessary for you to use Whitewallet effectively. We gather specific data when you utilize the Services or Application. We process only Personal Data obtained as a result of using our Services, Wallet, and Application itself. Therefore, We may collect the following types of Personal Data from you:

***Information you provide to us:*** when you contact us, participate in surveys or promotions, provide feedback, or seek customer/technical support, we may collect your contact information (e.g., full name, date of birth, email address, which may also be stored in hashed form for certain features) and any other contact information you choose to share (e.g., phone number or messaging handle). We also process user-generated content you submit (such as feedback text, reviews, screenshots or attachments) and data generated during a support request (ticket details, problem descriptions, and related correspondence). Where relevant, we may assign or record a User ID (e.g., screen name, handle, account ID, or other user- or account-level identifier) to administer your interactions with the Services.

***Information we collect automatically:*** Information we collect automatically: when you use Our Services, Wallet and/or the Application itself, we automatically collect certain technical and usage information, including IP address, device and advertising identifiers (e.g., Device ID), coarse location (approximate location derived from network or device settings, not precise latitude/longitude), and product interaction data (e.g., app launches, taps, clicks, scrolling, feature usage, and views). We also collect diagnostics, such as crash data (crash logs), performance data (e.g., launch times, hang rate, energy use), and other technical diagnostics used to monitor stability, security, and service availability.

**Note that the list of Personal Data, which is collected by Us may be updated from time to time, which will be reflected in this Privacy Policy. It is your obligation to review and acquaint yourself with the current version of this Policy.**

You have the right to refuse to provide Personal Data or any additional data not explicitly required. However, refusing to provide requested information may limit your ability to access or use all Whitewallet features and Services.

We will not sell, lease, exchange, rent, or loan your Personal Data to any third party without your prior explicit consent.

Still, there is certain data that we will not process. **We do not, at any point, collect or store your Seed phrase or any information related to your Wallet address information.** This includes Wallet creation, import, and ongoing use of Whitewallet Services. **Remember, your Seed phrase grants access to your assets, so it's**

**crucial to safeguard it independently. It can not be restored and is not saved by Us anywhere**, therefore you are responsible for remembering it and acknowledge that in case of loss of the Seed Phrase, you will lose access to the Wallet too.

Whitewallet's services are not directed towards, and we do not process any Personal Data from/related to individuals under 18 years old. If you are a parent or guardian and believe your child may have provided us with Personal Data, please contact us promptly. If We become aware that We have collected Personal Data from children without verification of parental consent, We will take steps to remove that information immediately.

Whitewallet adheres to all applicable Data Protection Regulations. We specifically refrain from processing "**Sensitive Personal Data**," which encompasses data such as: racial or ethnic origin, membership in political parties and political opinions or party affiliation, religious beliefs, health information, sexual orientation, etc. If you have any concerns that the aforementioned information may have been collected erroneously by Us, please contact us immediately via email to request its deletion.

Please note that We will try to limit the storage of your Personal Data to the extent that storage is necessary to serve the purpose(s) for which the Personal Data was processed, to resolve disputes, enforce our agreements, and as required or permitted by any applicable law.

During your use of Whitewallet and its Services, you may interact with third parties, such as: online payment services or analytics providers etc. This interaction may involve you providing them with your Personal Data. Whitewallet may, in some cases, receive information about you from these third parties.

It is important to note that these third parties may have their own privacy policies governing their collection and use of your Personal Data. We encourage you to familiarize yourself with these policies to understand how your Personal Data may be preceded by such third parties. By understanding their policies, you'll gain a clear understanding of how they collect and use your information. We are not responsible for the Personal Data that is being collected by them and regarding the ways in which your Personal Data may be processed by such third parties.

### **III. PERSONAL DATA DISCLOSURES**

You fully acknowledge and consent that We may share your Personal Data with third parties if this is necessary to provide Services and/or as required or permitted by law. What is more, We may integrate services and technologies from third parties into some functionality of Whitewallet. We have evaluated these third parties and can assure their adherence to the laws regarding personal data processing, nevertheless, We are not responsible for their actions. These third parties are required to adhere to adequate safeguards under data protection law, such as contractual obligations regarding confidentiality and data protection. We will only provide these third-party partner services with the Personal Data, which is necessary to fulfill their services. These third parties are obligated not to disclose or use your Personal Data for any purposes other than those to which are related to the provision of the Services.

When utilizing Whitewallet and its Services, you are acknowledging that we have the right to disclose and share your Personal Data with third parties, such as:

- a). Service providers and data processors that represent Us and provide services to Us, such as accounting, data processing or management services, maintenance and operation services, mail messaging services, analytics services, transaction processing, marketing, etc.;*
- b). Our subsidiaries or affiliates (if any) only if necessary for operational purposes;*

- c). *Our consultants, employees, contractors, agents and/or professional advisors to enable them to perform certain services for Us;*
- d). *Competent courts, public authorities, government agencies, and law enforcement agencies that require information disclosure on the grounds of legally binding requests, warrants, or court orders.*

In some circumstances, your Personal Data will be anonymized (*so that it would be impossible to determine that it refers to you*) for research or statistical purposes, in which case We may use this Personal Data indefinitely without further notice to you and without your approval.

Your Personal Data may be anonymized in certain situations for research or statistical purposes and in such cases. We reserve the right to use this information indefinitely without providing additional notice to you.

Additionally, you may disclose your Personal Data when sharing reviews regarding Whitewallet. In these cases, we do not take any responsibility for the reviews published on third-party platforms (*such as Play Market, App Store, etc*). Also, We may collect your Personal Data when filling out Our surveys or submitting feedback in order to gather information on how Our Services are working for the users and how to improve them. If you agree to participate in such surveys and feedback forms, We will collect the information included in your responses. Your participation in those surveys and feedback requests will be on the basis of your consent.

#### IV. DATA RETENTION PERIOD

You agree that We have the right, but not the obligation, to retain all Personal Data collected for the duration of your use of our Services and for the period required by law, but not less than 5 (five) years after the date of the latest interaction with the user. Please be aware that the right to retain the collected Personal Data continues to apply even if you delete your Wallet from the Whitewallet interface or uninstall the Whitewallet Application from your device, or request your information to be deleted in order to be compliant with applicable laws and regulations.

#### V. PURPOSES OF DATA COLLECTION AND UTILIZATION

Our collection of Personal Data is restricted to what is reasonably required for Us to effectively carry out the Services and features offered by Whitewallet.

Please, review the purposes for which your Personal Data is collected and processed by us:

**To grant you access and use Whitewallet Services:** This includes features like creating or importing wallets, storing and managing digital assets, and executing transactions.

**To provide customer and technical support:** Whitewallet needs your information to respond to your inquiries and troubleshoot any issues you encounter while using the services.

**To comply with legal and regulatory requirements.**

**To develop and improve Whitewallet Services:** User data can be anonymized and aggregated to analyze usage patterns and identify areas for improvement. We may process your Personal Data to better understand your preferences, and the way you use and interact with Whitewallet Services, so that we can further develop and expand Whitewallet functionality, and add new features and services.

**For marketing and advertising activities engagement:** We collect information about your usage of Whitewallet Services and your contact information to provide marketing and advertising activities (including

In-App advertisement). Based on your communication preferences, We may send you marketing and advertising communications using push notifications or other means to inform you about relevant product offers and services, to deliver targeted marketing, to provide you with promotional offers, details on events and other materials related to Our Services that We believe may interest you.

We may also use certain third-party marketing and advertising networks to help us to promote Whitewallet Services on our own platforms and on third-party websites and platforms such as remarketing ads across the Internet. You can opt out of Our marketing communications at any time.

We may apply third-party tools/providers, such as Google Analytics, with the purpose to automatically capturing and collecting analytics information about your use of the Application to understand how users interact with the Application so that We can further develop and enhance Our Services. This information includes your session durations, the content you accessed on the Application, your interactions and user-interface clicks, the frequency and scope of your use of the Application. For additional information on how Google Analytics processes your personal data, please refer to the Google Analytics Privacy and Terms.

In specific situations, We might seek your authorization to utilize your Personal Data for the purposes, not defined in this Privacy Policy. In such a case, your information will be processed only if you give your consent on that. You may withdraw your consent. Revoking your consent will not affect the lawfulness of the data processed prior to the revocation.

## VI. YOUR RIGHTS

As far as we adhere to the Data Protection Regulation, we would like to emphasize that you have the following rights:

**Right to access and correct:** you have the right to access your Personal Data stored by Whitewallet. You can also request corrections to any inaccurate or incomplete information.

**Right to be informed:** you can be provided with the information about the categories of your Personal Data that is being collected.

**Right to Object:** You have the right to object to the processing of your Personal Data for certain purposes, not approved by you or if the processing is carried out on a legal basis other than your consent.

**Right to Withdraw Consent:** the right to withdraw your consent is applicable if you have previously given consent for the processing of your Personal Data.

**Right to opt-out:** you can ask Us to stop using your Personal Data for business and other benefits.

**Right to be forgotten:** you can request Us to erase (delete) your Personal Data.

**Right to not being discriminated:** Whitewallet provides equal Services to all users. We cannot discriminate against you for exercising your rights.

**Right to Restrict the Proceession of your Personal Data:** You have the right to request restrictions on the processing of your Personal Data. In such cases, we can only Process the Personal Data with your explicit consent or that Personal Data which We are obliged to Process due to the legal requirements.

**Right to Lodge a Complaint:** If you believe We have violated your rights, you can contact Us at support@whitewallet.app in order to resolve the issue. You also have the right to lodge a complaint with a competent supervisory authority.

**Right to data portability:** If we process your Personal Data based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Data in a structured, commonly used, and machine-readable format, and to have Us transfer your Personal Data directly to another Controller, where technically feasible unless the exercise of this right adversely affects the rights and freedoms of others. By the term “**Controller**” We mean a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of your Personal Data;

## **VII. ENSURING THE PROTECTION AND SECURITY OF YOUR PERSONAL DATA**

Our top priority is safeguarding all Personal Data from any unauthorized access, alteration, disclosure, or destruction. We use appropriate technical and organizational safeguards to protect your Personal Data from unauthorized access, accidental loss, or other misuse.

To fulfill this commitment, we employ a range of organizational, technical, and administrative measures to uphold the security of your Personal Data. By utilizing secure storage with data encryption protocols, we maintain the confidentiality of your Personal Data.

Additionally, we have put in place various precautionary security measures to prevent accidental or unauthorized loss, destruction, damage, and unlawful processing of your Personal Data, such as:

**Physical Measures:** tangible media containing your Personal Data will be kept in a locked room.

**Electronic Measures:** computer data containing your Personal Data will be stored on computer systems and on tangible data carriers that are secured by strict log-in restrictions.

**Management Measures:** only an authorized and limited number of employees are permitted to come into contact with your Personal Data, and such employees who have undertaken to comply with our internal privacy policy are subject to strict contractual confidentiality obligations.

**Technical Measures:** encryption technology can be used to transmit and store your Personal Data. We use the various security technologies and controls currently available to minimize the risk that your Personal Data may be disclosed, corrupted, misused, obtained without authorization, disclosed without authorization, or altered. Our technical security team actively monitors abnormal and malicious activity.

**Other Measures:** These may include a periodic review of Our methods for collecting, storing, and processing Personal Data.

While we make every effort to secure your Personal Data, it is essential to recognize that absolute security cannot be guaranteed in electronic transmission and storage. We urge you to implement your own security measures for your Personal Data. By providing information to Us, you acknowledge and assume the potential risks involved. You also agree that We will not be liable for any Personal Data loss or damage that is not a result of our deliberate actions or gross negligence, such as hacking or technical failures beyond our control, to the fullest extent permitted by law.

Should you suspect that your Personal Data has been compromised and that your interaction with Whitewallet is no longer secure, we urge you to contact us immediately via email.

## VIII. INTERNATIONAL DATA TRANSFER

If you are located in the EU, make a notice that your Personal Data may be transferred to countries that are not part of the EU.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other Personal Data.

On Our side we will take the following measures to ensure that your Personal Data is being Processed in compliance with the Data Protection Regulations:

- *choosing only partners and services that are compliant with the EU standards;*
- *limiting access to your Personal Data to those employees, agents, contractors, representatives, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;*
- *procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data) including notifying you and the governing authority where We are legally required to do so.*

## IX. MISCELLANEOUS

Whitewallet may contain links to other websites and/or applications that are not operated by Us. This Privacy Policy does not apply to third-party websites, products, or services, even if we provide links to them, or they link to us. If you click on a third-party link, you will be directed to that third-party's website. We strongly advise you to review the Privacy Policy of every website you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

We pay attention that once you access a third-party platform or service through Whitewallet, the privacy policy and thus the rules regarding the collection and use of your Personal Data of that third-party platform or service will be applied. This Privacy Policy does not apply to such third-party sites as those sites are outside our control. Furthermore, we bear no responsibility for the privacy policies of other third-party platforms or services as we cannot ensure their accordance with our Privacy Policy requirements. We encourage you to read their privacy policies before providing any Personal Data to them.

We may update and/or change this Privacy Policy at any time for any reason. These updates and/or changes come into force since they are published in this Privacy Policy. You should review this Privacy Policy every time before starting to use Our Services. In case some of the terms or updates are unacceptable to you, you should refrain from using the Services and Application itself.

## X. FINAL PROVISIONS

Should you have any questions about this Privacy Policy, the practices of Our Service, or your dealings with Our Service, Services or Product, please contact Us at [support@whitewallet.app](mailto:support@whitewallet.app).

Your access to and use of Whitewallet indicates your explicit consent to the collection, storage, use, and disclosure of your Personal Data as detailed in this Privacy Policy.

If you disagree with any statements provided by this Privacy Policy, you have to stop using Whitewallet immediately.