

# Privacy Notice

## OneArt Wallet

Last update 30/12/2021

We are **OneArt Digital OÜ**, (hereinafter OneArt Digital OÜ will be referred to as “we”) care about your personal data, and we do everything to protect it. This Privacy Notice was created to help you to understand how your personal data is collected, stored and processed and what happens if you use our app.

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## 1. Purpose of this Privacy Notice

Privacy Notice is a document, practically a statement of us as a data controller to you (data subject) that describes how we collect, use, retain and disclose personal information.

Our Privacy Notice applies only to our OneArtWallet mobile app for iOS (“App”).

## 2. Who we are

<b>Data controller</b>	<b>OneArt Digital OÜ, registration number: 12551952</b>
<b>Address</b>	Estonia, Tallinn, Harju maakond, Mustamäe linnaosa, Retketee 26-25, 13419
<b>Email</b>	support@oneart.digital - for general questions
	privacy@oneart.digital - for privacy questions

### 3. Personal data we process

The data we process is divided into three categories: **automatically collected data**, data provided to us by the **users** and **data provided by third parties**.

**Automatically collected data.** When you use our App, some data is collected automatically. We need technical data to operate, maintain, and improve our App. This includes data such as device type and OS version.

Data are provided to us by the following data subject:

- **Users** — people who create an account in our App.

**Users:** We may collect wallet information and transaction information.

**Data provided by third parties:** Information we can get from AppStore and Appsflyer.

Once again, briefly about what personal data we collect:

Automatically collected data			
Type of data	Description of data	Legal basis	Reasons for processing
You use our App	<ul style="list-style-type: none"><li>● technical information</li></ul>	Legitimate interest	App operation; Analytics; Statistics.

Users' data			
Type of data	Description of data	Legal basis	Reasons for processing
You create an account	<ul style="list-style-type: none"><li>● password;</li><li>● seed phrase;</li><li>● pin code.</li></ul>	Performance of the contract	Registration; provide a service.
You click 'Import wallet'	<ul style="list-style-type: none"><li>● your wallet public address;</li><li>● your wallet type;</li><li>● your wallet asset.</li></ul>	Performance of the contract	Provide a service
You click 'History' of your NFT	<ul style="list-style-type: none"><li>● sale date of this NFT;</li><li>● transfer date of this NFT;</li></ul>	Performance of the contract	Provide a service

	<ul style="list-style-type: none"> <li>● minted date of this NFT;</li> <li>● owner nickname;</li> <li>● sale price of NFT.</li> </ul>		
You click 'Details' of your NFT	<ul style="list-style-type: none"> <li>● address wallet of contact person;</li> <li>● by whom NFT was created;</li> <li>● Token ID of this NFT.</li> </ul>	Performance of the contract	Provide a service
You click 'wallet details'	<ul style="list-style-type: none"> <li>● type of tokens</li> <li>● amount of tokens</li> <li>● history of token transfers</li> </ul>	Performance of the contract	Provide a service
You click 'add token'	<ul style="list-style-type: none"> <li>● token's contract address</li> </ul>	Performance of the contract	Provide a service
You click 'send'	<ul style="list-style-type: none"> <li>● receiver wallet address</li> </ul>	Performance of the contract	Provide a service

<b>Data provided by third party</b>			
<b>Type of data</b>	<b>Description of data</b>	<b>Legal basis</b>	<b>Reasons for processing</b>
You use our App	<ul style="list-style-type: none"> <li>● unique user ID</li> </ul>	Legitimate interest	Analytics
You leave a review on the Appstore	<ul style="list-style-type: none"> <li>● photo;</li> <li>● name;</li> <li>● email;</li> <li>● comment;</li> <li>● evaluation.</li> </ul>	Legitimate interest	Analytics; support.

**Pay your attention.** We knowingly **do not process** users' personal data under 18 without consent from a legal representative(s). If you are such a user or the user's legal representative, please let us know by email at [privacy@oneart.digital](mailto:privacy@oneart.digital).

## 4. Period of data storage

We store only **users'** wallet addresses. Due to the blockchain nature, your wallet address is stored there for a really long time. In our databases we store your data while you use our services and 3 years after.

We store **automatically collected data** for up to 3 years.

You can exercise your right to delete your data. In this case, we will delete your data from our servers within 30 days of your request.

The length of time we can retain **data from third parties** is determined by Apple [Privacy Policy](#) and [AppsFlyer Privacy Policy](#).

**Please note:** some data may be contained in documents that are required by law to be stored for a longer period of time (for example, accounting documents).

## 5. Sharing data with third parties

We use your personal data to perform a contract and for communication between the user and us. We use and transfer your personal data to the extent it is necessary to perform a contract. Also, we transfer your data on the following grounds:

**Consent.** We transfer your personal data based on your explicit consent.

**Compliance with the law.** We will disclose your personal data to third parties to the extent that it is necessary:

- to comply with a government request, court order, or applicable law;
- to prevent unlawful use of our App or violation of the Terms of Use of our App and our policies;
- to protect against claims of third parties;
- to help prevent or investigate fraud.

**Transfer to third parties:** We transfer your personal data to third parties based on a public offer for processing on our behalf, subject to technical and organizational measures to protect your personal data.

## 6. Your privacy right

You, as subjects of personal data, have the following rights:

<b>The right to access information.</b>	You can request an explanation of the processing of your personal data.
<b>The right to portability.</b>	You can request all the data that you provided to us, as well as request to transfer data to another controller.
<b>The right to restrict processing.</b>	You may partially or completely prohibit us from processing your personal data.
<b>The right to file complaints.</b>	If your request was not satisfied, you can file a complaint to the regulatory body.
<b>The right to be forgotten.</b>	You can send us a request to delete your personal data from our systems, unless there is a legal requirement to keep it.
<b>The right to withdraw consent.</b>	For data that you have previously consented to, you can always withdraw your consent and we will stop processing it.

To exercise your rights, write us an email at [privacy@oneart.digital](mailto:privacy@oneart.digital). We will answer you as soon as possible.

If your request was not satisfied, you can file a complaint to the Data Protection Inspectorate's regulatory body at [info@aki.ee](mailto:info@aki.ee) or write a letter to 39 Tatari St., 10134 Tallinn.

## 7. Transfer of data outside the European Economic Area

The personal data we collect is stored on Digital Ocean. The data is stored in France by default, but we may need to process your personal data in another country.

## 8. Update

The GDPR regulates this Privacy Notice and the relationships falling under its effect. Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice in our App. If significant material changes are made that affect your privacy and confidentiality, we will notify you by email or display information on the App and ask for your consent.