

# TTM Wallet Privacy Policy

**Version:** 1.01

**Last updated:** October 1, 2020

This Privacy Policy (“**Policy**”) describes how TTM Wallet collects and processes users’ data through the TTM Wallet App. The terms “we”, “us”, “our” refer to **btc2wire OÜ**, a legal person registered under the laws of Estonia (“**Company**”).

This Policy is part of the TTM Wallet Terms of Use (“**Terms**”), which are available on the bottom of the App.

We may update this Policy from time-to-time by posting a new version in the App. We advise you to check this page occasionally to ensure you are happy with any changes. However, we will endeavor to provide you with an announcement about any significant changes.

You can contact the Company at: [support@ttmbank.com](mailto:support@ttmbank.com).

## I. Overview

Your privacy is important to us. We are not going to misuse your data.

Due to the nature of the Services, we do not collect any personally identifiable information (“**Personal Data**”) from you when you open an Account in the App.

Notwithstanding the foregoing, the Company may collect some of the Personal Data from you when you contact the Company and during your use of the App.

## II. Information We Collect from You

### 2.1. Account Information

We do not collect any Account information from you.

When you open the Account on the App, we provide you with:

- a) a mnemonic phrase;
- b) a private key,

which are used to access your Wallet and virtual assets. However, we do not store them in any way and therefore cannot assist with their retrieval.

### 2.2. Wallet Information

To enable the deposit or withdrawal of virtual assets, we collect and process relevant Wallet information from you depending on the type of virtual asset you would like to deposit or withdraw.

We store this information in a secure and encrypted format and do not process it.

## **2.3. Security Information**

To secure your use of the App, we collect the following information from you:

- a) a password generated by you;
- b) a code generated by you.

We store this information secured against unauthorized access by using a hashing function. We encourage you to create a strong password and avoid sharing with other persons for the safety of your Account and virtual assets.

## **2.4. Usage Data**

We collect information about your experience – **the number of your assets, device information, IP-address, date, time, and duration of use of the App.**

We also collect the information about the **language of interface** you chose on the App to keep the interface in that language when you use the App next time.

We use the number of your assets to display it to you on the App and to provide you with information of their fiat equivalent.

All other usage data is used for analytical purposes.

Usage data is collected in an anonymized and aggregated way to improve the App's usability and for marketing purposes. Learn more about it in the section "Analytics" of this Policy.

## **2.5. Communication**

If you need technical support, have a privacy request, or any other inquiry, you can contact us and leave your message by proceeding to our technical support by contacting us at [support@ttmbank.com](mailto:support@ttmbank.com). In this case, we will receive some portion of the information from you (your name and email). We will use this information to provide you with the help you might need, fix and improve our Services, and analyze the App's efficiency.

# **III. How We Collect Information from You**

## **3.1. Overview**

We collect information from you when:

- a) you use the App and the Services;
- b) when you open the App and access your Wallet; and
- c) when you contact the Company.

## **3.2. Information we collect automatically**

The following information is collected automatically: the number of your assets, device information, IP-address, date, time, and duration of use of the App.

# **IV. Legal Base for Processing**

## **4.1. Provision of Services**

We use your wallet information and usage data to provide our Services.

## **4.2. Security**

We use security information to secure your access to the App and the Wallet, including usage of password and code.

#### **4.3. Customer Support**

We use the information we receive when you contact us to help you with your inquiry.

#### **4.4. Legitimate Interest**

For the marketing purposes, we process your statistics of activity on the App and your usage data. This data helps us to understand our target groups and conduct marketing research.

### **V. Acceptable Age**

We do not intend to collect nor knowingly process the children's (under 18 years old) Personal Data. Only individuals, who are already 18 years old, may use the App and provide information to us.

If you are a parent or legal guardian of a minor child, we will treat any information that you provide us on behalf of your minor child as provided in this Policy.

### **VI. Third-party Access**

Except as provided in this Policy, we will not sell, share, or rent your information to third parties.

#### **6.1. Analytics**

To analyze our efficiency and conduct marketing research, we use the services of analytics providers, in particular Intercom (<https://www.intercom.com/>) and Google Analytics (<https://analytics.google.com/>). When using the analytics services, we can share anonymized and aggregate details of TTM Wallet use, including, but not limited to traffic data, length of the visit, and other communication data.

This information does not allow to identify any certain person, so it is considered non-personally identifiable information.

Non-personally identifiable information is collected and processed, among other services in an anonymized and aggregated way to improve the App's usability and for marketing purposes.

#### **6.2. Third-party services**

We may share some of your information with third parties, whose services are integrated with the App solely for the purposes of the provision of such services, and only if you intend to receive such services.

#### **6.3. Other disclosures**

In addition to the disclosures for the purposes identified before, we may disclose information about you:

(a) **if we are required to do so by law, in connection with any legal proceedings or to establish, exercise or defend our legal rights;** and

(b) in case we sell, license or otherwise assign our Company, corporate rights, TTM Wallet or its separate parts or features to third parties.

## **VII. Data Retention**

We retain your data for as long as you use the App. We will delete most of the information when you delete the App, excluding some of the usage data that we may retain longer for analytical purposes.

We retain the information you provide us with when you contact us to provide you with customer support and do not store it afterward.

## **VIII. Information Security**

Your information is being stored and processed on the servers of the cloud provider inside the EU. These servers have technical measures to store the data securely and protected against unauthorized access.

To keep the processing, we may transfer the information outside the EU, e.g., for the purposes of technical maintenance. In this case, we will ensure that the necessary safeguards to process the information are met in accordance with applicable privacy regulations.

We take necessary and sufficient measures, including hashing and encryption of certain information, to protect your information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

Immediate access to some amount of the data is only allowed to our authorized employees involved in maintaining TTM Wallet. Such employees keep strict confidentiality and prevent unauthorized third-party access to personal information.

## **IX. Data Rights & Requests**

If you want to file a request or exercise any of your information rights under the applicable law, please contact us at [support@ttmbank.com](mailto:support@ttmbank.com).