



# Privacy Policy

Wallet



## OVERVIEW

Cryptocurve UNIPessoal LDA ("Cryptocurve", "us", "we", or "our") as the provider of the system under the brand of "UTRUST" operates the mobile application (the "wallet", "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our mobile application and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://www.utrust.com>

We create this Privacy Policy to clarify what and how we may collect, retain or process your personal data when visiting or using our service.

This policy is designed as a way to help you understand privacy policies and practices. This Privacy Policy should be complemented with due regulations and laws addressed to regulation and processing of personal data.



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# 1 Definitions

## Service

Service is the mobile application operated by CRYPTOCURVE UNIPessoal LDA under the brand of UTRUST Switzerland AG (hereinafter 'UTRUST').

## Personal Data

Personal Data means data about a living individual who can be identified from those data or from those and other information either in our possession or likely to come into our possession.

## Data collection

By uploading content into our mobile application ("wallet"), and/or signing in (application), provided in this service and/or providing information and documents requested in this service, you, as Subject Data, hereby indicate your explicit approval to the use of your Data according in this following Privacy Policy:

CRYPTOCURVE is processing personal information submitted by you ("Data Subject") in the context of your use of the mobile application. For this purposes, compiles, collects, processes and stores the Data in Records, mainly for the use of our services.

This covers details about how and where you access our services and account activity that is shown on your account such as:

- Transactions historic;
- Amount, frequency, type, location, origin and recipients;
- Profile and usage data;
- Security details you create and use to connect to our services.

## Data Processing

"Process" or "Processing" shall mean each (set of) action(s) as regards to the Data, including, but not limited to, the collecting, recording, sorting, keeping, updating, amending, retrieving, consulting, using, provisioning by way of forwarding or other way of dissemination, gathering, linking, protecting, erasing or destroying of Data.



## Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself.

## Cookies

Cookies are small pieces of data stored on your device.

## Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are or are to be processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

## Data Processors

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

## Data Subject

Data Subject is any natural person who is using our Service and is the object of Personally Identifiable Information (PII), as described in article 4.º of GDPR.

## 2 Type of data we collect

### Personal Data

While using our Service, we may identify you ("Personal Data"). Personally identifiable information may include, **but is not limited to:**

- Full name
- Identification number
- Email address
- Phone number
- Device and connection information
- Usage and log information



- Location information

We may use your personal data to contact you for other purposes as newsletters, marketing or promotional materials and other information that may be of interest to you. If you opt to receive any or all of these communications from us you should give your explicit consent when asked for it. You may also opt out of receiving them by withdrawing your consent at any time and with no further justification.

### Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as the time and date of usage, unique device identifiers and other diagnostic data.

### Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are small files with data which may include an anonymous unique identifier. Cookies are sent to you and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.
- Registration and subsequent information – when you register to use our Services we will collect Personal Data as necessary to offer and fulfil the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address, to establish an Account. We may require you to provide us with additional Personal Data as you use our Services.
- Transaction and experience information – when you use our Services, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction.
- Other participants Personal Data – when you use our Services, we collect Personal Data you provide us about the other participants associated with the transaction.
- Send or request money – when you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you.



- Personal Data about you from third-party sources – we obtain information from third-party sources such as data providers and others, where permitted by law.
- Other information we collect related to your use of our Services – we may collect additional information from or about you when you communicate with us, contact our customer support teams.

### Your Account information

We may collect basic information to create an Account. You provide us, all in accordance with the applicable law, the phone number and you may provide us an email address. You may also add other information to your account, such as profile picture.

### Customer Support

We may collect information related to your use of our services, including copies of your messages and how to contact you so we can provide you customer support.

### Technical information

This information may include, but not limited to, IP address, mobile device ID, location, type of mobile device and operating system you use to access our mobile application, search terms, features you use, operating systems you use, Internet service provider.

## 3 Use of data

CRYPTOCURVE may use the collected data for various purposes, but not limited to:

- To provide our mobile application and the content to you;
- To operate, provide and maintain our Service, including customer support;
- To notify you about changes to our Service;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To gather analysis or valuable information so that we can improve the content and functionality of our Service;
- To monitor the usage of our Service;
- To detect, prevent and address technical issues, including fixing and conduct troubleshooting activities;



- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about - if you have opted in to receive such information;
- To provide useful information later used for statistical purposes;
- To verify accounts and activity in order to promote safety and security on and off our Service;
- To communicate with you about our services and features and let you know about our policies and updates.

## 4 Retention of data

CRYPTOCURVE will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations and with applicable law, resolve disputes, and enforce our legal agreements and policies. CRYPTOCURVE will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods. We are legally obligated to retain data for a period of seven years after the end of a business relationship with a customer or after the date of an occasional transaction.<sup>1</sup>

## 5 Data processing

Under European laws, companies have a legal basis to process data. We may collect, use and process your Personal Data:

- To perform a contract with you;
- Consistent with your consent, which you can revoke at any time;
- The processing is in our legitimate interests and it's not overridden by your rights;
- As necessary to fulfill our terms;
- As necessary to comply with our legal obligations;
- As necessary in the public interest, including undertaking research and to promote safety and security;

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<sup>1</sup> Under our obligation to retain data defined in Portuguese Law no. 83/2017 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing.



- Occasionally to protect your vital interests, of those of others, including protection of your integrity or that of others;
- To secure our service and network, verify accounts and activity and for providing measurement, analytics and other business services where we are processing data as a controller.

## 6 Transfer and share data

Your information, including Personal Data, may be transferred to other entities located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. CRYPTO CURVE 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 information.

Additionally, we may share your Personal Data or other information for a variety of motives. We may employ third party companies and individuals to facilitate our Service, or to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose:

- With members of UTRUST: we may share your Personal Data to, namely, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and criminal activity and other violations of our policies and agreements.
- With third-parties providers: these third-party service providers may, for example, to monitor and analyze the use of our Service. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>



- With other financial institutions that we have partnered with to create and offer a service: these financial institutions may only use this information for UTRUST-related issues, unless you have given consent for other uses.
- With other third parties for our business purposes or as permitted or required by law: we may share information about you with other parties for UTRUST's business purposes or as permitted or required by law, including:
  - If we need to do so to comply with the law, such as anti-fraud and other compliance purposes;
  - With [Onfido](#) for purposes of identity verification;
  - To law enforcement authorities or other competent authorities;
  - If we believe that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
  - To investigate possible violations or enforce a user agreement or other legal terms;
  - To protect our property, Services and legal rights;
  - To facilitate a purchase or sale of all or part of UTRUST's business;
  - To help assess and manage risk and prevent fraud against us, our Users, our business partners, or other individuals, and merchants.
- We may share your data with a limited number of our service providers to help provide customer support to you or keep payments safe and secure. All our third-party service providers are required to take appropriate security measures to protect your data in accordance with our policies. We permit them to process your data only for specified purposes and in accordance with our instructions. We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property or safety of our site, our users, and others. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process.

In addition, CRYPTOCURVE may provide aggregated statistical data about how, when, and why Users use our Services. This data will not personally identify you or provide information about your use of the Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

## 7 Cookies and Tracking technologies

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used



are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

We use [Hotjar](#) in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices, device screen size, device type (unique device identifiers), geographic location (country only), preferred language used to display our service. Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on [this link](#).

We use [Appsee](#) to understand user's experience and to provide an analysis of our users' behavior. You may check Appsee's policies by clicking on [this link](#).

We also use [Fabric](#) to understand our user's needs and improve our services and user experience. For further details, please see Fabric's privacy policy by clicking on [this link](#).

We use [Testflight](#) to understand your needs and optimize the service and experience. For further details, please see Fabric's privacy policy by clicking on [this link](#).

We use [Segment](#) to collect, clean, control and funnel all the collected data. For further details, please see Segment's documentation by clicking on [this link](#).



## 8 Protection of Personal data

Under the General Data Protection Regulation or other applicable laws, you have certain data protection rights. CRYPTOCURVE aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us. You have the following data protection rights:

- The right to access, update or to erase the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data. We store information until is no longer necessary to provide our services, or until your account is deleted.
- The right of rectification. You have the right to rectify and update your information if that information is inaccurate or incomplete. Please remember that when you delete your account, it does not affect the information other users have relating to you, such as their copy of the messages you sent them.
- The right to object. You have the right to object to our processing of your information.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to port your information and be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where CRYPTOCURVE relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data.

We collect, use, retain and share your information if we have a good-faith belief that is necessary to:

- Respond pursuant to the applicable law;
- To enforce our terms and other policies, including investigation of potential breaches or violations;
- To detect, prevent and address fraud or other illegal activities or technical issues;
- To protect your rights, property and safety.



## 9 Links To Websites

Our mobile application may contain links to websites that are not operated or controlled by us. If you click on a third party link, you will be directed to that third party's website.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party websites or services. We encourage you to review the privacy statements of each and every website you visit and be mindful of the information you may submit to any such third party.

## 10 Age requirements

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## 11 Changes To This Privacy Policy

We may amend or update our Privacy Policy from time to time. We will notify you of any material change and we will provide you with explicit notice of material changes as required by law. Changes to this Privacy Policy are effective when they are posted. 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. You are advised to review this Privacy Policy periodically for any changes.

## 12 Commitment

We take the responsibility to protect the security and privacy of our users seriously. We have established effective policies that define our commitment to data security and the information technology we manage. We are continually reviewing policies and procedures to assure that they are appropriate and effective in meeting our commitments to our community, our users, customers and ourselves. Any suspicious attempt to breach our terms and policies, or to engage in any type of unauthorized action involving our information



systems, is regarded as potential criminal activity. All suspicious computer mischief will be reported to the appropriate authorities.

## 13 Contact

If Users have any questions relating to these Policy, the User's rights and obligations arising from Terms and Conditions and/or User's use of the services, or any other matter, please contact [compliance@ustrust.com](mailto:compliance@ustrust.com)