

## Privacy Policy

Last updated: March 30, 2023

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

### Interpretation and Definitions

#### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

#### Definitions

For the purposes of this Privacy Policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- Company (referred to as either “the Company”, “We”, “Us”; or “Our” in this document) refers to BitCanna.
- Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- Country refers to: Netherlands
- Device means any device that can access the Service such as a computer, a mobile phone or a digital tablet.
- Personal Data is any information that relates to an identified or identifiable individual.
- Service refers to our services, namely the webwallet, our main website, the payment plugin Cosmos Pay and the e-mail list for sending updates
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Website refers to the applicable websites, accessible from [wallet.bitcanna.io](https://wallet.bitcanna.io) for the webwallet, [www.bitcanna.io](https://www.bitcanna.io) for our main website.
- You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

### Collecting and Using Your Personal Data

#### Types of Data Collected

##### **Usage Data**

Usage Data is collected automatically when using the Service. This data is gathered in the logs of the servers used to host the Service. Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device

unique ID, the IP address of Your mobile device, Your mobile operating system and the type of mobile Internet browser You use.

## Use of Your Personal Data

Service	Type of Personal Data	Purpose of processing	Basis in law	Retention period
Webwallet	Connecting via browser: including, but not limited to, protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit  Connecting via mobile device: including, but not limited to, the type of mobile device You use, Your mobile device unique ID, Your mobile operating system, protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit	To perform the Service (making the digital connection that is necessary to have your device communicate with our server and sending the requested information to your device (e.g. price information))	Necessary for the performance of our Service  Provision of this data is a necessary requirement within the meaning of Article 13(2) under point e GDPR.	For a maximum of 2 weeks
		To investigate security incidents	Necessary for a legitimate interest of our Company and You (for us to be able to offer a secure Service)	For the duration of the investigation and (if applicable) subsequent reparatory action
Payment plugin "Cosmos Pay"	Connecting via browser: including, but not limited to, protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit  Connecting via mobile device: including, but not limited to, the type of mobile device You use, Your mobile device unique ID, Your mobile operating system, protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit	To perform the Service (making the digital connection that is necessary to have your device communicate with our server and sending the requested information to your device)	Necessary for the performance of our Service  Provision of this data is a necessary requirement within the meaning of Article 13(2) under point e GDPR.	For a maximum of 2 weeks
		To investigate security incidents	Necessary for a legitimate interest of our Company and You (for us to be able to offer a secure Service)	For the duration of the investigation and (if applicable) subsequent reparatory action
Payment plugin "Cosmos Pay"	Memo accompanied with Your payment transaction (note: this is a random string of characters and does not contain any Personal Data)	To be able to check if a payment is done based on 3 parameters; receival address, amount paid and memo	Necessary for the performance of our Service  Provision of this data is a necessary requirement within the meaning of Article 13(2) under point e GDPR.	The payment plugin uses the memo solely to check the payment and is stored in the backend of the webshop of the shopowner. BitCanna has no access to it. But please be aware that the memo is stored on the blockchain (i.e. decentralized, not within control of BitCanna). The memo will remain (theoretically) visible in the blockchain history forever.
Mobile app (not yet live, latest Q2 2023)	Including, but not limited to, the type of mobile device You use, Your mobile device unique ID, Your mobile	To perform the Service (making the digital connection that is necessary to have your device communicate with our server and sending the requested	Necessary for the performance of our Service  Provision of this data is a necessary requirement within	For a maximum of 2 weeks

	operating system, protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit	information to your device (e.g. price information) To investigate security incidents	the meaning of Article 13(2) under point e GDPR. Necessary for a legitimate interest of our Company and You (for us to be able to offer a secure Service)	
Email service	Email service data (name, email address, subscription date, feedback on receipt and opening of emails)	To send monthly dev updates and other announcements (e.g. about releases of modules) To otherwise communicate with You when necessary	Consent Necessary for a legitimate interest of our Company and You (determined on a case-by-case basis)	Until consent is withdrawn Five years after the end of our business relationship with you.
Website	Including, but not limited to, the type of mobile device You use, Your mobile device unique ID, Your mobile operating system, protocol address (e.g. IP address), browser type, browser version and the time and date of Your visit	To perform data analysis, identifying usage trends, and to evaluate and improve Our Service, products, services, marketing and Your experience	Necessary for a legitimate interest of our Company	Non-aggregated data: 30 minutes

We will not share Your personal information with other entities or companies.

**Transfer of Your Personal Data**

The Usage data is only stored on the server operating the Service. The Company 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.

## Delete Your Personal Data

You have the right to ask us for an overview of the Personal Data that we process about You (“right of access”). Please note that the Usage Data that we process is only subject to data protection rules because this data could theoretically be traced back to individuals, if we were to combine it with additional information gathered elsewhere. In our normal course of business, we do not actually do this, so we generally cannot trace Usage Data back to You. If You use Your right of access, we will show You the Personal Data that we can connect to You without actively gathering additional information.

For Personal Data that we process on the basis of Your consent, You have the right to withdraw Your consent at any time. Withdrawing Your consent does not affect the lawfulness of processing based on Your consent before its withdrawal.

For Personal Data that we process on the basis of a legitimate interest, You have the right to object on grounds relating to Your particular situation.

We do our solid best to only process Personal Data that is correct, and only when it is necessary and lawful. Should it ever turn out that Personal Data we process about You is incorrect or unlawful for us to process, then You have the right to have Your Personal Data rectified or erased, or have its processing restricted.

You can invoke any of these rights by sending us an email through: <https://www.bitcanna.io/contact/>

Please note that we may have to ask You certain control questions or request that You provide identification, when You invoke a right regarding Personal Data. We have to be able to authenticate You as the data subject.

If You are unhappy with the way we are processing Your Personal Data or the way we handled a request to exercise Your rights, please tell us, so we can try to resolve the issue. If we are unable to resolve it, you have the right to lodge a complaint with the Data Protection Authority in the Netherlands: <https://autoriteitpersoonsgegevens.nl/en>

## Disclosure of Your Personal Data

### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

- Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

#### Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site 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.

#### Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### Contact Us

If you have any questions about this Privacy Policy, You can contact us:

By visiting this page on our website: <https://www.bitcanna.io/contact/>