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# **Privacy Policy**

*Release 0*

**GNU Taler team**

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Last Updated: 11.12.2019

This Privacy Policy describes the policies and procedures of Taler Systems SA (“we,” “our,” or “us”) pertaining to the collection, use, and disclosure of your information on our sites and related mobile applications and products we offer (the “Services” or “Taler Wallet”). This Privacy Statement applies to your personal data when you use our Services, and does not apply to online websites or services that we do not own or control.



## OVERVIEW

Your privacy is important to us. We follow a few fundamental principles: We don't ask you for personally identifiable information (defined below). That being said, your contact information, such as your phone number, social media handle, or email address (depending on how you contact us), may be collected when you communicate with us, for example to report a bug or other error related to the Taler Wallet. We don't share your information with third parties except when strictly required to deliver you our Services and products, or to comply with the law. If you have any questions or concerns about this policy, please reach out to us at [privacy@taler-systems.net](mailto:privacy@taler-systems.net).





## HOW YOU ACCEPT THIS POLICY

By using our Services or visiting our sites, you agree to the use, disclosure, and procedures outlined in this Privacy Policy.



## WHAT PERSONAL INFORMATION DO WE COLLECT FROM OUR USERS?

The information we collect from you falls into two categories: (i) personally identifiable information (i.e., data that could potentially identify you as an individual) (“Personal Information”), and (ii) non-personally identifiable information (i.e., information that cannot be used to identify who you are) (“Non-Personal Information”). This Privacy Policy covers both categories and will tell you how we might collect and use each type.

We do our best to not collect any Personal Information from Taler Wallet users. We believe that the Taler Wallet never transmits personal information to our services without at least clear implied consent, and we only process and retain information with a strict business need. That being said, when using our Services, we inherently have to collect the following information:

- Bank account details necessary when receiving funds from you to top-up your wallet or to transfer funds to you when you are being paid via Taler. At the current experimental stage, only the pseudonym and password you entered in the bank demonstrator is stored.
- The amounts being withdrawn or deposited, with associated unique transaction identifiers and cryptographic signatures authorizing the transaction. Note that for purchases, we cannot identify the buyer from the collected data, so when you spend money, we only receive non-personal information.
- When you contact us. We may collect certain information if you choose to contact us, for example to report a bug or other error with the Taler Wallet. This may include contact information such as your name, email address or phone number depending on the method you choose to contact us.



## **HOW WE COLLECT AND PROCESS INFORMATION**

We may process your information for the following reasons:

- to transfer money as specified by our users (Taler transactions);
- to assist government entities in linking income to the underlying contract as required by law and local regulations
- to support you using the Taler Wallet or to improve our Services



## HOW WE SHARE AND USE THE INFORMATION WE GATHER

We may share your Personal Data or other information about you only if you are a merchant receiving income, with your bank, to the degree necessary to execute the payment.

We retain Personal Data to transfer funds to the accounts designated by our users. We may retain Personal Data only for as long as mandated by law and required for the wire transfers.

We primarily use the limited information we receive directly from you to enhance the Taler Wallet. Some ways we may use your Personal Information are to: Contact you when necessary to respond to your comments, answer your questions, or obtain additional information on issues related to bugs or errors with the Taler Wallet that you reported.





## **AGENTS OR THIRD PARTY PARTNERS**

We may provide your Personal Information to our employees, contractors, agents, service providers, and designees (“Agents”) to enable them to perform certain services for us exclusively, including: improvement and maintenance of our software and Services.



## PROTECTION OF US AND OTHERS

We reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with the law or a court order.



## WHAT PERSONAL INFORMATION CAN I ACCESS OR CHANGE?

You can request access to the information we have collected from you. You can do this by contacting us at [privacy@taler-systems.net](mailto:privacy@taler-systems.net). We will make sure to provide you with a copy of the data we process about you. To comply with your request, we may ask you to verify your identity. We will fulfill your request by sending your copy electronically. For any subsequent access request, we may charge you with an administrative fee. If you believe that the information we have collected is incorrect, you are welcome to contact us so we can update it and keep your data accurate. Any data that is no longer needed for purposes specified in the “How We Use the Information We Gather” section will be deleted after ninety (90) days.



## WHAT ARE YOUR DATA PROTECTION RIGHTS?

Anastasis would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access: You have the right to request Anastasis for** copies of your personal data. We may charge you a small fee for this service.

**The right to rectification:** You have the right to request that Anastasis correct any information you believe is inaccurate. You also have the right to request Anastasis to complete information you believe is incomplete. The right to erasure - You have the right to request that Anastasis erase your personal data, under certain conditions.

**The right to restrict processing: You have the right to request** that Anastasis restrict the processing of your personal data, under certain conditions.

**The right to object to processing: You have the right to object to** Anastasis's processing of your personal data, under certain conditions.

**The right to data portability: You have the right to request that** Anastasis transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [privacy@taler-systems.com](mailto:privacy@taler-systems.com)

You can always contact your local data protection authority to enforce your rights.





## DATA RETENTION

If you uninstall the Taler Wallet mobile applications from your device, or request that your information be deleted, we still may retain some information that you have provided to us to maintain the Taler Wallet or to comply with relevant laws.



## DATA SECURITY

We are committed to making sure your information is protected. We employ several physical and electronic safeguards to keep your information safe, including encrypted user passwords, two factor verification and authentication on passwords where possible, and securing connections with industry standard transport layer security. You are also welcome to contact us using GnuPG encrypted e-mail. Even with all these precautions, we cannot fully guarantee against the access, disclosure, alteration, or deletion of data through events, including but not limited to hardware or software failure or unauthorized use. Any information that you provide to us is done so entirely at your own risk.



## CHANGES AND UPDATES TO PRIVACY POLICY

We reserve the right to update and revise this privacy policy at any time. We occasionally review this Privacy Policy to make sure it complies with applicable laws and conforms to changes in our business. We may need to update this Privacy Policy, and we reserve the right to do so at any time. If we do revise this Privacy Policy, we will update the “Effective Date” at the bottom of this page so that you can tell if it has changed since your last visit. As we generally do not collect contact information and also do not track your visits, we will not be able to notify you directly. However, the Taler Wallet may inform you about a change in the privacy policy once it detects that the policy has changed. Please review this Privacy Policy regularly to ensure that you are aware of its terms. Any use of our Services after an amendment to our Privacy Policy constitutes your acceptance to the revised or amended agreement.



## **INTERNATIONAL USERS AND VISITORS**

Our Services are hosted in Switzerland. If you are a user accessing the Services from the European Union, Asia, US, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from Swiss laws, please be advised that through your continued use of the Services, which is governed by Swiss law, you are transferring your Personal Information to Switzerland and you consent to that transfer.





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CHAPTER  
**FOURTEEN**

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**QUESTIONS**

Please contact us at [privacy@taler-systems.net](mailto:privacy@taler-systems.net) if you have questions about our privacy practices that are not addressed in this Privacy Statement.