TON Wallet Privacy Policy

Date: 11th of July, 2025

Your privacy matters to us. This Privacy Policy explains how we collect, use, and disclose your Personal Information when you access and use TON Wallet. We respect privacy laws worldwide and strive to meet the highest standards in protecting your information. By using TON Wallet, you confirm that you have read and agreed to this Privacy Policy.

- 1.Personal Information We Collect and Use
- 1.1.TON Wallet is a non-custodial wallet, and we do not create or maintain user accounts. Accordingly, we do not collect information such as private keys or wallet seeds. We will never request these, and you should never share them with anyone. Any request for such data should be considered fraudulent.
- 1.2. "Personal Information" (also referred to as "Information" or "Your Information") means information that identifies, relates to, describes, or could reasonably be linked, directly or indirectly, to you. While your blockchain activity may be publicly visible due to the transparent nature of distributed ledger technology, TON Wallet only collects a limited set of information as strictly necessary to provide access to and improve TON Wallet, in compliance with applicable laws.
- 1.3. We do not collect or process biometric data or other forms of sensitive personal information.
- 1.4.We may collect Personal Information directly from you or automatically from your device as outlined below:

Purpose	Legal basis	Information processed
To provide you with access to TON Wallet	Performance of the contract	IP-address, Telegram Identification Number, Telegram Username Transaction History
To support seed phrase recovery	Performance of the contract	Email address, IP-address, Telegram Identification Number, Telegram Username
To provide access to Third-Party Utilities	Performance of the contract	Wallet Address, IP-address, Email address (where necessary)

To communicate with you	Performance of the contract	Email address, Telegram Username
To improve the design, functionality, and user experience of TON Wallet	Legitimate Interest	Interaction data such as page views, session duration, navigation paths (in anonymized and aggregate form)
For direct marketing (e.g. fulfilment of requests, communications, notices, updates, policy changes)	Legitimate interest	Email address, Telegram Identification Number
For fraud prevention, security, and to ensure lawful use of TON Wallet	Legitimate interest	IP address, Telegram Identification Number, Telegram Username, usage data related to your interaction with TON Wallet
To comply with legal obligations (e.g., tax, accounting, regulatory requirements) and to establish, exercise, or defend legal claims	Legal obligation	IP address, Telegram Identification Number, Telegram Username, Transaction History, Email address

1.5.We do not collect or process biometric data or other forms of sensitive personal information. If you choose to enable biometric access (such as fingerprint or facial recognition) to your TON Wallet, please note that such data is processed and stored locally on your device in accordance with the applicable policies of your device manufacturer or operating system provider. TON Wallet does not access, store, or transmit your biometric information.

2. Your Privacy Rights

Depending on your location and applicable data protection laws, you may have certain rights in relation to your personal information. These rights include:

- 2.1.Right to Know: You may have the right to request information about the categories of personal information we collect, the sources of that information, the purposes for which we use it, and with whom it is shared.
- 2.2. Right to Access: You may request a copy of the personal information we hold about you.
- 2.3. Right to Correction: You may request that we correct inaccurate or incomplete personal information.

- 2.4.Right to Deletion: You may have the right to request that we delete your personal information, subject to certain exceptions (for example, where we are legally required to retain it).
- 2.5. Right to Data Portability: You may request to receive your personal information in a portable and, to the extent technically feasible, readily usable format.
- 2.6.Right to Withdraw Consent: Where processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- 2.7.Right to Object or Restrict Processing: In certain circumstances, you may object to or request restrictions on how we use your personal information, including for direct marketing purposes.

3. Disclosure of Your Information to Third Parties

- 3.1.TON Wallet may share technical and usage-related information (such as device type, browser data, log information, and interaction metrics) with service providers who assist us in maintaining, securing, and operating TON Wallet. These service providers act on our behalf and process data strictly for operational and support purposes under appropriate contractual safeguards.
- 3.2.TON Wallet may also share limited personal information (such as your wallet address, IP address or email) with third-party providers solely to give you access to Third-Party Utilities that you have explicitly requested. We disclose only the minimum data necessary to enable the provision of such Third-Party Utilities.
- 3.3.Providers of Third-Party Utilities operate as independent data controllers. The processing of your personal information by them is governed by their own privacy policies and terms of use. This Privacy Policy does not apply to the privacy practices of the providers of such Third Party Utilities or to any external websites linked through TON Wallet. The inclusion of a third-party link does not imply endorsement by us or our affiliates.
- 3.4. Your use of any Third Party Utility and the handling of your personal information will be subject to that third party's privacy notice and terms of use.

4. How We Protect Your Personal Information

4.1.We implement appropriate technical and organisational measures designed to protect your personal information from unauthorised access, loss, misuse, alteration, or disclosure. These measures are proportionate to the type of data we process and the level of associated risk, and may include encryption, access controls, secure communication protocols, and internal security policies. 4.2. While we take reasonable steps to safeguard your information, no method of transmission over the internet or method of electronic storage is entirely secure. Therefore, we cannot guarantee absolute security of your data.

5. Retention of Personal Information

- 5.1. We retain your personal information only for as long as necessary to provide you with access to TON Wallet and fulfil the purposes described in this Privacy Policy, including compliance with legal, regulatory, or operational requirements.
- 5.2.Please note that due to the public and immutable nature of blockchain technology, certain information—such as wallet addresses and transaction history—cannot be deleted or modified. As a result, some data may remain visible on the blockchain even after you stop using TON Wallet.

6.Cross-border Data Transfers

- 6.1. Your Information may be transferred to and processed in countries other than your country of residence. These locations may have different data protection laws than those in your jurisdiction.
- 6.2.We take appropriate steps to ensure that your data remains protected when we transfer Information across borders, including to third-party service providers or partners who support the operation of TON Wallet. This may include implementing contractual safeguards, such as data processing agreements, and adopting technical and organisational measures to maintain a level of data protection that is consistent with applicable legal standards.

7.No Processing of Children's Information

- 7.1.TON Wallet is not directed to, and we do not knowingly collect, use, or disclose personal information from individuals under the age of 13 (or under the age of majority in their jurisdiction of residence, where applicable). If you are under the applicable age threshold, you may not access or use TON Wallet, and we do not intend for our solutions to be used by minors.
- 7.2.We do not knowingly process any personal information of children. If we become aware that we have inadvertently collected personal information from a child without verified parental consent, we will take reasonable steps to delete such information from our records promptly.
- 7.3.If you believe that a child under the applicable age has provided personal information to us, please contact us using the information provided in the *Contact Information* section of this Privacy Policy.

8. How to Contact Us

9. How to Read This Privacy Policy

This Privacy Policy forms part of the wider set of documents that govern your use of TON Wallet. It should be read in conjunction with our Terms of Use and any other applicable notices or policies made available to you within TON Wallet.

10. Updates to This Privacy Policy

- 10.1.We may update this Privacy Policy from time to time to reflect changes in legal, technical, or business developments. When we make changes, we will revise the "Last Updated" date at the top of this page. In some cases, we may notify you through additional means (such as in-app notices or emails) if the changes are material.
- 10.2. We encourage you to review this Privacy Policy periodically to stay informed about how we protect your personal information.