

# (EN) Privacy Policy - VouGee App

of the VouGee wallet app, short VouGee app, of the VouGee GmbH, Körösistraße 21, 8010 Graz, Austria, FN 425169z, valid from 01.06.2018 until further notice.

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## 1. Introduction

In this policy, "we", "us" and "our" refer to [vougee.com](https://vougee.com).

This policy

- is not a user guide
- is not a warranty declaration
- is not the terms and conditions
- is not a FAQ and/or help page

We are safeguarding the privacy of our users. We comply fully to the General Data Protection Regulation (GDPR) of the European Union and SEPA regulations as well as to all corresponding Austrian and European laws in our fields of business. This policy applies to all personal data of our users we process in our app. There is NO registration, NO input and/or NO publication of your private and/or personal data with our app except following declarations.

VouGee is not responsible for your device, the installed operating system and/or branding by your provider. VouGee is not responsible for the blockchain used by the VouGee app in any way. All these systems are totally out of our influence and in front of our app. In case of an issue please contact the responsible provider.

## 2. How we use data

The processing of data in decentralized, public networks, in particular in the case of blockchains, takes place independently (free will, **consent**) by the user. For this purpose, VouGee offers functions at certain points in its app, the activation of which requires the explicit consent of the user and is explained as leaving the area of responsibility of VouGee and relieving VouGee of any responsibility within the meaning of the GDPR.

We set out the general categories of personal data that we may process, the systems where we process it, the source and specific categories of that data, the purposes for which we may process personal data and the legal bases of the processing as follows:

The VouGee App allows you to connect to a blockchain and so check, receive and send crypto assets ("coins") from and to your private key within the blockchain. We developed the app with the highest grade of diligence and strongly comply to the principles of "Security by design". Strong wallet encryption and cryptography ensure that your funds will remain under your ultimate control. Your private key never leaves your device if;

- your device is not compromised (got hacked) by third (unknown) parties and
- you do not transmit it (or the restore key / pass phrase) to another place or you make this information available to others (third parties).

You need no registration and no input of any personal data to use the VouGee app. We do not process any personal data in our Vougee app, also not your IP address. Per design there is no function within the app available which allows anyone to input and /or receive any personal data (also not from outside/third party systems). So all the rest of the data stays anonymous within the scope of our app. We have no access to your data within the app, the app acts in a decentralized way under ONLY your ultimate control. When you are using the app there is;

- no registration
- no support possibility
- no KYC
- no identity linking

- no bureaucracy for transmitting coins
- no access restriction to your funds
- no transaction restriction (limit)
- no IP association and tracking
- no transaction tracking

The YouGee app can be obtained through following distribution channels ONLY, the Playstore (Android devices) or the Appstore (Apple devices). There is no warranty that the service might work properly if you obtain it from other sources.

We strongly point out that we are not responsible for any data loss, loss of your private key and/or the restore key, data breach or other damage (also financial and probably further financial ones) when you are using the decentralized app. The security and safety of your device is totally under your responsibility. Also we'll be never able to restore your private key within the app as well as we are not able to access your app in any way for service or maintenance purpose.

### 3 Persons legal capacity

If the legal capacity and so business ability for settling a deal is not given (this is affecting in common underaged persons or persons with other disabilities), back settlement can be arranged directly between the (former/initial) contracting parties within the system by sending the corresponding coins back (or exchanging it in fiat) through our app and the blockchain. This is not under our control, so we can not assist you or enforce any business activity in case of a conflict with another party.

In case this is affecting deposits or withdraws through our website we have to point out, that only persons which are allowed to hold a bank account are able to register and so to deposit or withdraw. This is additionally only possible if the bank account is SEPA compliant. In the case of an issue please contact the corresponding bank institution (your bank) or payment provider (your payment provider) which allowed you to settle the transaction to sell or buy coins.

We strongly point out that YouGee can not prevent or draw back any transaction because of the intrinsic behaviour of the underlying blockchain principles. We are not responsible for any transaction within the blockchain, nevertheless you use our systems (website or app) or other means (apps) to do so. You are fully and self responsible for all your actions and all those of people whose guardian you are (underaged people under your guidance, your kids, mentally impaired persons, etc.).

You therefore commit - when using the app - to indemnify and hold us harmless.

### 4 Processed Personal Data

We process following personal data of your mobile device within our app:

- phone number

If you grant us the right through Android we will process all data of your contacts. The legal basis for this processing is **consent**. This data is needed to send or receive coins to your contacts. The data we process will be provided to our app through functions provided by Android as well as steered by the current policy of Google. You will be asked explicitly by android OS to grant us access. Generally we use following data to produce a unique hash of a contact record:

- Mobile phone number
- Firstname
- Lastname
- Address (street name, street number, town, zip, country)
- Email

Your walletaddress and public key you receive once and all your transactions are stored within the blockchain. this means this data is always public available. This data is generally anonymous and there is no relation to your account or personality possible outside of the app if you don't publish this information through other means or tell it to your contacts. Except your contacts we'll never give this personal data and the relation-data to other systems.

If you deny to grant us access to your contacts and so deny to process data of your contacts or if you revoke the right to process it later on you won't be able to send or receive coins through your address book. All other functionality of the app will be not affected by revoking this right.

### 5. Providing your personal data to others or vice versa

We do not disclose your personal data to any other party except your contacts if you trigger this action and grant access to your contacts.

You actively, if enabled and rights are granted (see previous chapter 4) can connect to your contacts and send or receive coins to /from them through our app ("contact functionality").

Do not supply any other person's personal data to us, unless we prompt you to do so. Do not provide any data to us through other channels than our official ones shown on our website [www.vougee.com](http://www.vougee.com).

## 6. Retaining and deleting personal data

Personal data that the app processes for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. As long as you want use the contacts functionality grant the app the right. If you revoke it, no data within the app will be left.

## 7. Amendments

We may update this policy from time to time by publishing a new version on our website or github.

The privacy policy in the current version is available under [www.vougee.com/privacy/app](http://www.vougee.com/privacy/app) or under the corresponding github URL. It extends our terms and conditions, available under [www.vougee.com/terms](http://www.vougee.com/terms) when the app is not published as open source software.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy by our website or through an new version of our app in the app. or playstore.

All rights (name, logo, intellectual property, etc.) remain always at VouGee.

## 8 Your rights

In this Section, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law (GDPR) are:

1. the right to access;
2. the right to rectification;
3. the right to erasure;
4. the right to restrict processing;
5. the right to object to processing;
6. the right to data portability;
7. the right to complain to a supervisory authority; and
8. the right to withdraw consent.

Because

- your data never leaves the app
- the data is under your ultimate control - you grant or revoke access to the only source, your contacts (address book)
- only your phone number is used within the app but never published
- there is no data stored anywhere else than in your Android device
- hashes of your contacts are one way encrypted and so anonymized by priciple
- the app does not transmit any personal data

we

- can not supply to you any personal date and/or delete it (it only on your device) or maps of processing (because there is none)
- can not restrict the processing (because there is none)
- have no control over your app (because there is no way to connect to)

You have the right to confirmation as to whether or not we process your personal data by

- installing the app

- granting access to your address book (contacts)

To the extent that the legal basis for our processing of your personal data is:

1. consent; and
2. that the processing is necessary for the performance of the app and its functionality (if you wish so)

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time by

- Revoking access to your address book (contacts) and/or
- deinstalling the app and/or
- deleting your public key (and/or your restore key)

Withdrawal will not affect the lawfulness of processing before the withdrawal. Your transactions in the blockchain will stay untouched from this actions too.

## 9. Data protection officer & GDPR compliance

Our data protection and GDPR compliance officer's contact details are: [gdpr@vougee.com](mailto:gdpr@vougee.com)