

# Privacy Notice for Walme: Web3 Bank & Messenger

Last updated: 7 January 2025

## Intro

Walme Finance s.r.o. (“**Walme**” or “**we**”) welcomes you. This Privacy Notice (“**Privacy Notice**”) applies to our Platform available via the [website](#) and mobile application available in the App Store and Google Play, (together “**Platform**”).

The Privacy Notice describes which of your personal data the Platform collects, how stores, processes, and uses it, and what happens when you use the Platform.

## Content

[About us](#)

[About you](#)

[Personal data](#)

[Sources of data](#)

[Lawful bases for processing](#)

[Users' data](#)

[Registered Users' data](#)

[Wallet Users' data](#)

[Chat Users' data](#)

[Newsletter Subscribers' data](#)

[Support Requesters' data](#)

[Data received from third parties](#)

[Data sharing with third parties](#)

[Use of AI and data handling](#)

[Usage guidance](#)

[Data processing and transparency](#)

[Commitment to privacy and transparency](#)

[Data protection](#)

[Data subjects rights](#)

[European Economic Area and United Kingdom residents](#)

[Data sharing outside the European Economic Area](#)

[United States residents](#)

[Do not sell my personal information](#)

[Do-not-track requests](#)

[Canada residents](#)

[Cookies](#)

[Privacy Notice updates](#)

## About us

We are the controller of your personal data processed through the Platform. This means that we determine the purposes and means of personal data processing.

<b>Name</b>	Nexis Systems LLC
<b>Registration number</b>	445757565
<b>Address</b>	Mikhail Lermontov Street, N 109, Floor 3, Apartment N13
<b>Email</b>	<a href="mailto:info@walme.io">info@walme.io</a> – for general inquiries
	<a href="mailto:info@walme.io">info@walme.io</a> – for privacy inquiries

## About you

When you visit the Platform, you become our user (“**User**”).

We divide the Users into categories so you can easily find details about the processing of your personal data. Pay attention that you can fall into several categories depending on your actions.

<b>Type of User</b>	<b>Description</b>
Registered User	User who has registered on the Platform
Wallet User	User who has connected the wallet to the Platform
Chat User	User who uses Platform messenger
Newsletter Subscriber	User who subscribes to the newsletter when filling out the newsletter form
Support Requester	User who reaches out us on the support issue

**Please note!** We do not knowingly process the personal data of Users under the age of 16. If you are such a User or the legal representative of such a User, please [contact us](#).

## Personal data

### Sources of data

We receive your data when you visit and interact with the Platform, depending on your actions on the Platform.

You can change your personal data by exercising your right to rectification or by the Platform functionality. Please note that the same lawful basis and storage terms apply to the changed data.

We may also (although we do not necessarily do so) receive [data from third parties](#). It depends on your settings and the features you use.

## Lawful bases for processing

To process your personal data, we rely on the following lawful bases:

- **performance of the contract** – for the processing of personal data necessary for the negotiating on, conclusion, and performance of a contract (mainly, the Terms of Services) with you;
- **legitimate interest** – for the processing necessary for the development of our services, taking into consideration your interests, rights, and expectations;
- **legal obligation** – for the processing as required by applicable laws (for example, to comply with tax or KYC/AML regulations) or if requested by a law enforcement agency, court, supervisory authority, or another state-authorized public body;
- **consent** – for additional specific purposes.

If we collect personal data on the basis of legitimate interest or performance of the contract, we can use it for another purpose after checking that the new purpose is compatible with the original purpose.

When your data processing is based on a legal obligation or performance of the contract, you are obliged to provide your personal data. We need this data to comply with legal requirements or to properly provide you with our services. The failure to provide such data may have negative consequences, such as tax liability, inability to enter into a contract or provide services to you, etc.

## Users' data

When you visit the Website, we collect some data automatically. We collect some technical data about the Users to optimize performance, debug issues, and enhance features while ensuring security and privacy to improve the overall user experience.

Most of the technical data we collect are anonymous, but some data is associated with your IP address and device ID. Please read about personal technical data below.

Data	Reasons for processing	Lawful basis
Information about the coarse location (IP address, country)	The optimization of the performance, debugging, enhancement of the features' proper functioning, administering and improvement of the Website	Legitimate interest
Technical device information and network information (including IP address, HTTP user agent, Internet Service		

Provider (ISP), date, OS version and type, browser version and type, time zone, reference URL, session ID, network metadata, and website interactions)		
<b>Data storage</b>		
We store the data for 3 years from its collection to correct potential technical errors and conduct analytics.		

We also need cookies to operate, support, and improve the Website's functionality.

<b>Data</b>	<b>Description</b>	<b>Reasons for processing</b>	<b>Lawful basis</b>
Necessary cookies	Information that is necessary for the operation of the Website	Improving your experience of using the Website	Performance of the contract
Marketing cookies	Marketing information used to match relevant advertising to you	Marketing	Consent
Statistics cookies	Statistical data used to understand how you interact with the Website	Improvement of the Website and analysis of the statistics for other purposes	Consent
<b>Data storage</b>			
We store the data during the expiry period provided in our Cookie Notice			

## Registered Users' data

We collect your personal data when you create and edit an account on the Platform.

<b>Data</b>	<b>Reasons for processing</b>	<b>Lawful basis</b>
Email	To create and verify your account	Performance of the contract
Verification code		
Username	To personalize your account	Performance of the contract
Photo or avatar		
Display name		

PIN or enable biometrics  <b>Please note!</b> We do not have access to your PIN and biometrics. This data is hashed and is visible only to you.	To secure your account	Performance of the contract
<b>Data storage</b>		
We store the data for 3 years from your deletion of the account to respond to potential disputes and prevent misuse or fraud		

### Wallet Users' data

We collect some of your personal data when you create or import your wallet and exchange tokens.

Data	Reasons for processing	Lawful basis
Seed phrase and private key  <b>Please note!</b> We do not have access to your seed phrase and private key. This data is hashed and is visible only to you.	To secure your account	Performance of the contract
Wallet public address	To import your wallet	Performance of the contract
Wallet type		
Wallet asset		
Token's contract address	To exchange tokens in the SWAP process	Performance of the contract
Receiver wallet address		
<b>Data storage</b>		
We store the data until you delete your account to provide you with the functionality of the Platform		

### Chat Users' data

We collect some of your personal data when you communicate with other users in the chat on the Platform.

Data	Reasons for processing	Lawful basis
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Text of messages	To communicate with other users of the App	Performance of the contract
Attachments		
<b>Data storage</b>		
We store the data until you delete your account to provide you with the functionality of the Platform		

### Newsletter Subscribers' data

We collect your personal data when you fill in the newsletter form.

Data	Reasons for processing	Lawful basis
Email	To provide you with our updates and the latest news	Consent
<b>Data storage</b>		
We store the data until you unsubscribe from the newsletter to provide you with our updates		

### Support Requesters' data

We collect some of your personal data when you fill in the support form on the Platform.

Data	Reasons for processing	Lawful basis
Email	To answer and help you with your questions	Performance of the contract
Message		
<b>Data storage</b>		
We store the data for 3 years after the last communication to respond to potential disputes and prevent misuse or fraud		

### Data received from third parties

We may receive some personal data from third parties.

The amount of data collected, the purposes, and the lawful basis for processing are determined by the respective privacy documents of these third parties.

Category of data	Third party	Reasons for processing	Lawful basis	Privacy documents
Registration data	Google	To create an account	Performance of the contract	<a href="#">Privacy Policy</a>
	Apple			<a href="#">Privacy Policy</a>

	X			<a href="#">Privacy Policy</a>
KYC confirmation	SumSub	To confirm your successful KYC check	Legal obligation	<a href="#">Privacy Notice</a>
Contact data	Discord	To connect your account to the waitlist	Performance of the contract	<a href="#">Privacy Policy</a>
	Telegram			<a href="#">Privacy Policy</a>
	X			<a href="#">Privacy Policy</a>

## Data sharing with third parties

We can share your personal data with third parties without any harm to you and in full compliance with applicable law. In addition, we have implemented organisational and technical measures to ensure the security of personal data during data transfer to third-party.

Third parties	Description
Communication Services	We use third-party services, such as Mailgun and Amazon SES, to facilitate the delivery of technical and informational messages.
Authentication Providers	Third-party tools, such as Auth0, are utilized to manage account creation, user authentication, and secure login processes.
Identity Verification	Third-party providers, such as SumSub, are used to verify user identities and complete KYC (Know Your Customer) checks in compliance with legal requirements.
Analytics tools	We rely on analytics services, including Hotjar, Metaplex, Mixpanel, and Google Analytics, to analyze user interactions and optimize platform performance.
Social networks	We use various social networks to spread information about our activities.
Data storage services	We use various cloud services, like PostgreSQL and HostMarket, that allow us to securely store data on remote servers.
Providers of the services our team use	We use CRM systems, messengers, and other services in our organization to provide you with our services.
State authorities, courts, law enforcement agencies, etc	<p>We may be obliged to transfer some of your data to tax authorities, courts, law enforcement agencies, and other governmental bodies:</p> <ul style="list-style-type: none"> <li>to comply with a government request, court order, or applicable law;</li> <li>to prevent unlawful use of the Platform;</li> <li>to protect against claims of third parties;</li> </ul>

- to help prevent or investigate fraud.

To get a detailed list of the third-party recipients of your personal data, [contact us](#).

To share your data, we rely on the following lawful bases, depending on the case: consent, compliance with the law, and performance of a contract.

## Use of AI and data handling

### Usage guidance

Our platform is designed to integrate AI-powered tools to enhance your experience, particularly in providing personalized and real-time insights. AI-based features include real-time alerts on market events, such as changes in trading volume, gas fees, wallet activity, and other indicators. You have the option to customize the notifications to suit your preferences. Please note that any outputs, including trading recommendations, should be interpreted with caution and do not constitute financial advice.

### Data processing and transparency

Your personal data will be processed strictly in compliance with the GDPR and other applicable privacy regulations. This includes data shared with us for configuring AI-driven alerts, recommendations, or personalized assistance. The data is used solely for these purposes and to enhance the functionality of our platform. You retain full [rights to your personal data](#) and can manage your privacy preferences at any time.

### Commitment to privacy and transparency

We are committed to ensuring transparency in how AI tools function and how your data is handled. As we roll out these AI-powered features, we will provide clear explanations of their functionality and associated data practices. For further information or if you have concerns regarding your data and privacy, please contact us.

The Privacy Notice reflects our ongoing commitment to leveraging advanced AI tools responsibly while prioritizing your privacy and trust.

## Data protection

We apply a variety of security measures appropriate to the possible risks.

Organisational measures	
Staff training	Internal policies and instructions
Non-disclosure agreements (NDA)	Transfer protection



Access control mechanism
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Technical measures	
Two-factor authentication	Backups
Firewalls	Encryption of data
Implementation of HTTPS	End-to-end encryption

## Data subjects rights

You, as a data subject (individual), have the right to interact with your data directly or through a request to us. This section describes these rights and how you can exercise them depending on your residency.

To exercise your rights, [contact us](#).

### European Economic Area and United Kingdom residents

Right	Description
Right to access	You can request information on whether personal data are being processed, and, where that is the case, access to this personal data and the information required by law.
Right to rectification	You can change the data if it is inaccurate or incomplete.
Right to erasure	You can send us a request to delete your personal data from our systems. We will remove them unless otherwise provided by law.
Right to restrict the processing	You may partially or completely prohibit us from processing your personal data in cases provided by law.
Right to data portability	You can request all the data you provided to us and request to transfer data to another controller.
Right to object	You may object to the processing of your personal data that is collected on the basis of legitimate interest.
Right to withdraw consent	You can withdraw your consent at any time.
Right to file a complaint	If your request was not satisfied, you could file a complaint to the regulatory body.

**For EEA residents:** We will answer your request within one month. If your request is not satisfied, you can submit a complaint to your local Data Protection Authority. You may find it [here](#).

**For UK residents:** We will answer your request within one month. If your request is not satisfied, you can submit a complaint at the Information Commissioner's Office via number 0303-123-1113 or go online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## Data sharing outside the European Economic Area

We may share personal data with the recipients of other countries, including non-EEA ones, ensuring that your data is protected and processed in accordance with the General Data Protection Regulation.

To share the data outside the EEA, we rely on the adequacy decision by the European Commission or the Data Privacy Framework participation of the recipient.

If the recipient does not participate in the Data Privacy Framework and its country is not deemed to provide an adequate level of protection for your personal data, we adopt Standard Contractual Clauses based on legislation assessments for data protection during transfer and storage.

You can read more detailed measures to protect your personal data [here](#).

## United States residents

Your rights vary depending on the state of your residency, as indicated below.

Right	Description	Area
Right to access	You can request an explanation of the processing of your personal data.	<ul style="list-style-type: none"> <li>● California;</li> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● Indiana;</li> <li>● Iowa;</li> <li>● Montana;</li> <li>● New Hampshire;</li> <li>● New Jersey;</li> <li>● Oregon;</li> <li>● Tennessee;</li> <li>● Texas;</li> <li>● Utah;</li> <li>● Virginia.</li> </ul>
Right to correct	You can change the data if it is inaccurate or incomplete.	<ul style="list-style-type: none"> <li>● California;</li> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● Indiana;</li> <li>● Montana;</li> <li>● New Hampshire;</li> <li>● New Jersey;</li> <li>● Oregon;</li> <li>● Tennessee;</li> <li>● Texas;</li> <li>● Virginia.</li> </ul>
Right to delete	You can send us a request to delete	<ul style="list-style-type: none"> <li>● California;</li> <li>● New Jersey;</li> </ul>

	your personal data from our systems.	<ul style="list-style-type: none"> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● Indiana;</li> <li>● Iowa;</li> <li>● Montana;</li> <li>● New Hampshire;</li> <li>● Oregon;</li> <li>● Tennessee;</li> <li>● Texas;</li> <li>● Utah;</li> <li>● Virginia.</li> </ul>
Right to portability	You can request all the data you provided to us and request to transfer data to another controller.	<ul style="list-style-type: none"> <li>● California;</li> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● Indiana;</li> <li>● Iowa;</li> <li>● Montana;</li> <li>● New Hampshire;</li> <li>● New Jersey;</li> <li>● Oregon;</li> <li>● Tennessee;</li> <li>● Texas;</li> <li>● Utah;</li> <li>● Virginia.</li> </ul>
Right to opt out of sales	The right to opt out of the sale of personal data to third parties.	<ul style="list-style-type: none"> <li>● California;</li> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● Indiana;</li> <li>● Iowa;</li> <li>● Montana;</li> <li>● New Hampshire;</li> <li>● New Jersey;</li> <li>● Oregon;</li> <li>● Tennessee;</li> <li>● Texas;</li> <li>● Utah;</li> <li>● Virginia.</li> </ul>
Right to opt out of certain purposes	The right to opt out of processing for profiling/targeted advertising purposes.	<ul style="list-style-type: none"> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● Indiana;</li> <li>● Montana;</li> <li>● New Hampshire;</li> <li>● New Jersey;</li> <li>● Oregon;</li> <li>● Tennessee;</li> <li>● Texas;</li> <li>● Utah;</li> <li>● Virginia.</li> </ul>
Right to opt out of the processing of sensitive data	The right to opt-out of processing of sensitive data.	<ul style="list-style-type: none"> <li>● California.</li> </ul>
Right to opt in for sensitive data processing	The right to opt in before processing sensitive data.	<ul style="list-style-type: none"> <li>● Colorado;</li> <li>● Connecticut;</li> <li>● Delaware;</li> <li>● New Jersey;</li> <li>● Oregon;</li> <li>● Tennessee;</li> </ul>

		<ul style="list-style-type: none"> <li>• Indiana;</li> <li>• Montana;</li> <li>• New Hampshire;</li> <li>• Texas;</li> <li>• Virginia.</li> </ul>
Right against automated decision-making	A prohibition against a business making decisions about a consumer based solely on an automated process without human input	<ul style="list-style-type: none"> <li>• California;</li> <li>• Colorado;</li> <li>• Connecticut;</li> <li>• Delaware;</li> <li>• Indiana;</li> <li>• Iowa;</li> <li>• Montana;</li> <li>• New Hampshire;</li> <li>• New Jersey;</li> <li>• Oregon;</li> <li>• Tennessee;</li> <li>• Texas;</li> <li>• Virginia.</li> </ul>
Private right of action	The right to seek civil damages from a controller for violations of a statute.	<ul style="list-style-type: none"> <li>• California.</li> </ul>

We will answer your request within 30 to 60 days, depending on the state and legislative requirements. If your complaint is not satisfied, you can submit a complaint to the [Federal Trade Commission](#).

**Please note!** Some states do not have privacy laws. The rights of residents of such states are governed by U.S. federal law. If your state is not on the list, please [contact us](#).

## Do not sell my personal information

California residents have the right under the California Consumer Privacy Act (“**CCPA**”) to opt out of the “sale” of their personal information by a company governed by the CCPA.

We do not sell your personal information to anyone nor use your data as a business model.

However, we support CCPA by allowing California residents to opt out of any future sale of their personal information. If you would like to record your preference that we will not sell your data in the future, please [contact us](#).

## Do-not-track requests

California residents visiting the Platform may request that we do not automatically gather and track information about their online browsing movements across the Internet.

Such requests are typically made through web browser settings that control signals or other mechanisms that allow consumers to exercise choice regarding collecting personal data about an individual consumer’s online activities over time and across third-party websites or online services.

We currently do not have the ability to honor these requests. We may modify this Privacy Notice as our abilities change.

## Canada residents

Right	Description
Right to access	You can request an explanation of the processing of your personal data.
Right to rectification	You can change the data if it is inaccurate or incomplete via request or profile settings on the Platform.
Right to delete	You can send us a request to delete your personal data from our systems or delete your account via Platform settings. We will remove all data unless some of them we have to store in compliance with the law requirements.
Right to data portability	You can request all the data you provided to us and request to transfer data to another controller.
Right to object opt-out	You may object to the processing of your personal data.
Right to withdraw consent	You can withdraw your consent at any time.
Right not to be subject to automated decision-making	You can object to being subject to automated-based processing to know if there are consequences concerning them due to such processing.
Right to lodge a complaint	If your request is not satisfied, you can file a complaint to the regulatory body.









We have 30 days to exercise your request from the moment it is received on our [contact email](#).

If your complaint is not satisfied, you can file a complaint to the [Office of the Privacy Commissioner of Canada](#).

## Cookies

We use cookies that are needed for the website's operation. By using cookies, we receive automatically collected data. You can read more in the Cookie Notice.

If you want to turn off cookies, you can find instructions for managing your browser settings at these links:

 <a href="#">Internet Explorer</a>	 <a href="#">Firefox</a>	 <a href="#">Chrome</a>	 <a href="#">Opera</a>
 <a href="#">Microsoft Edge</a>	 <a href="#">Vivaldi</a>	 <a href="#">Safari</a>	 <a href="#">Brave</a>

## Privacy Notice updates

This Privacy Notice is developed according to the General Data Protection Regulation, other applicable privacy laws, and best privacy practices.

Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on the Platform.

If there are material changes to the Privacy Notice or the Platform that affect your data privacy rights, we will notify you by displaying information on the Platform and, if necessary, ask for your consent.