

WALL Privacy Policy

Welcome to Wall.App!

Through Questing, CRM and Analytics, we enable web3 companies and administrators to drive growth, engagement and community action; and help their users and members to become active contributors to their projects.

Shoonya Labs offers tools and services to companies and community administrators; and to the users to help discover projects and participate in their token community.

Your privacy is important to us. It is Shoonya Labs' policy to respect your privacy and comply with any applicable law and regulation regarding any personal information we may collect about you, including across our website, <https://wall.app>, and other sites we own and operate. Personal information is any information about you which can be used to identify you. This includes information about you as a person (such as name, address, and date of birth), your devices, payment details, and even information about how you use a website or online service. In the event our site contains links to third-party sites and services, please be aware that those sites and services have their own privacy policies. After following a link to any third-party content, you should read their posted privacy policy information about how they collect and use personal information.

This Website/Application collects some Personal Data from its Users.

Personal Data is processed for the following purposes and using the following services:

- **Analytics :**
 - **Google Analytics, Hotjar Form Analysis & Conversion Funnels**
 - Personal Data: Tracker (Anonymous), Usage Data
- **Displaying content from external platforms**
 - **Google Fonts**
 - Personal Data: Tracker; Usage Data
- **Hosting and backend infrastructure**
 - **Amazon Web Services (AWS)**
 - Personal Data: various types of Data as specified in the privacy policy of the service
- **Registration and authentication**

- **Twitter OAuth**
 - Personal Data: various types of Data as specified in the privacy policy of the service
- **Discord OAuth**
 - Personal Data: various types of Data as specified in the privacy policy of the service
- **Wallet Connection (EVM based)**
- **Telegram OAuth**
- **Social features**
 - Public profiles in-app
- **User database management**
 - Private profiles in-app

Contact information

Owner and Data Controller

Shoonya Tech Ltd. - Craigmuir Chambers, Road Town, Tortola, VG 1110, British Virgin Islands

Owner contact email: privacy@wall.app

Complete Privacy Policy

Types of Data collected

Among the types of Personal Data that this Website/Application collects, by itself or through third parties, there are: Usage Data; Tracker.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website/Application.

Unless specified otherwise, all Data requested by this Website/Application is mandatory and failure to provide this Data may make it impossible for this Website/Application to provide its services. In cases where this Website/Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Website/Application or by the owners of third-party services used by this Website/Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website/Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website/Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Displaying content from external platforms, Analytics, Hosting and backend infrastructure, Social features, User database management and Registration and authentication.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Website/Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – Privacy Policy – [Opt Out](#).

Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd.

Hotjar honors generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar’s opt-out information [here](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: Malta – Privacy Policy – [Opt Out](#).

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website/Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts (Google LLC)

Google Fonts is a typeface visualization service provided by Google LLC that allows this Website/Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this Website/Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Website/Application.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: France – [Privacy Policy](#).

Registration and authentication

By registering or authenticating, Users allow this Website/Application to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website/Application will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Twitter OAuth (Twitter, Inc.)

Twitter OAuth is a registration and authentication service provided by Twitter, Inc. and is connected to the Twitter social network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Discord OAuth

Discord OAuth is a registration and authentication service provided by Discord, Inc. and is connected to the Discord messaging social Website/Application. [Privacy Policy](#).

Wallet Connect

Wallet Connect is a registration and authentication service provided by WalletConnect, Inc. and is connected to multiple wallet services. [Privacy Policy](#)

Social features

Public profiles in-app

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with this Website/Application. Users can choose which Personal Data they show in public in their profile, and edit their choice at any moment.

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website/Application, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website/Application. Some of these services may also enable the sending of timed messages to the User, such as emails and/or notifications based on specific actions performed on this Website/Application.

Private profiles in-app

Users may have private profiles that Administrators can see. In addition to the Personal Data provided, this profile may contain Users' interactions with this Website/Application.

Further information about the processing of Personal Data

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification.

Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website/Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website/Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Website/Application and any third-party services may collect files that record interaction with this Website/Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

This Website/Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies as mentioned above in the document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Website/Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Website/Application (or third-party services employed in this Website/Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website/Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Website/Application) and the details about the path followed within the Website/Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Website/Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website/Application. The Data Controller, unless otherwise specified, is the Owner of this Website/Application.

This Website/Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Website/Application as described in the relative terms (if available) and on this site/Website/Application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website/Application, if not stated otherwise within this document.