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Privacy Policy

Privacy Policy

1. Introduction

We are 360 FLYKICKS LIMITED ("Myqallet" or "the Company"). For the purpose of the Data Protection Legislation, Myqallet is the data controller of Your (as defined below) Personal Information (herein defined).

For any access request, questions or inquiries about how we use Your Personal Information, please contact us at support@myqallet.com.

Myqallet do not take Your trusting us with Your information for granted. The privacy of our Users is important to us and we are committed to safeguarding it responsibly and in accordance with the legal requirements of the countries in which we operate. Hence, this Privacy Policy explains the type of Your Personal Information which we collect, why we collect it, and what we do with it.

Definitions

Account: means an account opened and maintained by You with Myqallet to enable You use or access the Services;

Applicable Laws means all laws in force and effect as of the date hereof and which may be enacted or brought into force and effect hereinafter in the applicable Territory, including statutes, rules, regulations, directions, bye-laws, notifications, ordinances and judgments having force of law, or any final interpretation by a court of law having jurisdiction over the matter in question as may be in force and effect during the subsistence of this Privacy Policy;

Cookies: A cookie is a small data file that is transferred to Your computer or mobile device. It enables us to remember Your account log-in information, IP addresses, web traffic, number of times You visit, browser type and version, device details, date and time of visits.

Myqallet means the cryptocurrency wallet service offered by the Company on the Site pursuant to which a User may send and receive cryptocurrency;

Personal Information: Any information that can be used to identify a living person including Identity Data such as Your full name and government issued identification number, Contact Data such as contact and email address, Financial Data such as credit or debit card information, bank account number, etc., taxpayer identification, it may also include anonymous information that is linked to You, for example, Your internet protocol (IP), log-in information, address, location, device or transaction data and/or such other data personally identifiable to You as specified in this Privacy Policy.

Services means access to the Site, APIs or Apps provided to you by Myqallet which enables you to access Myqallet either as a merchant or user, and other related services;

User or You or Your: means user of the Site, APIs or Apps that has opened an Account with us and/or utilizes our Services.

Special Categories of Personal Information: means details about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about Your health and genetic and biometric data.

3. Objective

This Privacy Policy provides all persons whose Personal Information we hold with a description of the types of Personal Information we collect, the purposes for which we collect that Personal Information, the other parties with whom we may share Personal Information with, and the measures we take to protect the security of the data in relation to the Services.

We have outlined our Privacy Policy below.

4. Our Privacy Principles

Myqallet focuses on the following core principles:

5.1 To Empower the individual: Myqallet wants You to be in charge of Your Personal Information and to make Your own voluntary choices about Your Personal Information;

5.2 To keep and secure Personal Information: Myqallet does not take Your trusting us with Your information for granted. We take responsibility to ensure that appropriate security measures are put in place and Your Personal Information is protected;

5.3 To be transparent and to educate Users: For You to know what Personal Information is, how we collect Personal Information, the purpose for collecting Personal Information and how we secure Personal Information;

5.4 To abide by privacy laws in the Territory: Myqallet is committed to complying with privacy laws in the terrain you reside;

5.5 To collect and store Personal Information on the “need to collect” basis: Myqallet collects Personal Information to perform its services for You. We implement measures to prevent collecting and storing Personal Information beyond what we need.

5.6 It's mandatory for all first time users to generate a private key for their wallet to enable them make transactions smoothly.

6. Personal Information We May Collect About You

We may collect, record and use information about You in physical and electronic form and will hold, use and otherwise process this data in accordance with the Data Protection Legislation and as set out in this Policy.

The Personal Information we collect and use may include, amongst other things:

6.1. Identity Data: Information such as, Your full name(s), Your government-issued identity number, and Your date of birth. This data is to enable us to verify Your identity in order to offer our Services to You;

6.2. Contact Data: This is data that we use to contact You, such as Your name, residential address, email address, telephone number, details of the device You use and billing details;

6.3. Identification documents: (such as Your passport or any Government-issued identity card), a photograph (if applicable), bank statement, affidavit, utility bill or other bill and any other registration information You may provide to prove You are eligible to use our Services and in compliance with regulatory requirements on Know Your Customer (KYC);

6.4. Usage Data: When You access the Services, our servers automatically record information about how You use our Services including links You have clicked on, length of visit on certain pages, unique device identifier, log-in information, location and other device details;

6.5. Information from other sources: We may also receive Personal Information about You from other sources such as our affiliate, in the event you maintain an account with the Affiliate, Our identity verification partners, in line with the fulfilment of our Anti Money Laundering and Combating the Financing of Terrorism (AML/CFT) obligations;

6.6. Transactional Data: This is information containing details of the transactions You carry out when using our Services, including

geographic information;

6.7 Marketing and Communications Data: This includes both a record of Your decision to subscribe or to withdraw from receiving marketing materials from us or from our third parties;

6.8. Records of Your discussions with us if we contact You and if You contact us; and

We may also collect, store, use and transfer non-Personal Information or anonymized data such as statistical or demographic data. Anonymized data could include Your personal data but is not considered personal data in law as this data will not directly or indirectly reveal Your identity. For example, we may aggregate Your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data to include Your personal data so that it can directly or indirectly identify You, we treat the combined data as personal data, which will be subject to the terms of this Privacy Policy and the Data Protection Legislation.

As a principle, we do not collect any Special Categories of Personal Information. If we do collect Special Categories of Personal Information, we will ensure compliance with Applicable Laws.

It is important that the Personal Information we hold about You is accurate and current. Please keep us informed if Your Personal Information changes during Your relationship with us.

This Privacy Policy applies to the Services only. We do not exercise control over the sites displayed or linked from within our various services. These other sites may place their own cookies, plug-ins or other files on Your computer, collect data or solicit Personal Information from You. Myqallet does not control these third-party websites and we are not responsible for their privacy statements. Please consult such third parties' privacy statements and set appropriate controls from Your setting when using any third-party services.

7. How We Collect Your Personal Information and Why We Have It

The Personal Information we have about You is directly made available to us when You:

7.1. Sign up for an Account;

7.2. Use the Services;

7.3. Contact our customer support team;

7.4. Fill our online forms;

7.5. Other Sources: we may receive information about You from other sources, including publicly available databases and combine this data with information we already have about You, This helps us to update, expand and analyze our records and provide services that may be of interest to You.

8. Our Legal Basis for Processing Your Personal Information

We only use Your Personal Information for a specific purpose; and before we do so, we must have a legal reason. For example, when it is necessary for us to perform a contract with You for our Services, for our legitimate interest, or where You have given us Your consent, or to fulfill our legal obligations. These are all known as the “legal or lawful basis for processing”.

The legal or lawful basis we rely on for processing Your Personal Information by using our Services:

8.1 Your consent: Where You agree to us collecting Your Personal Information by using our Services.

8.1.1 With your consent, we may send marketing and promotional communications by email, SMS and push notifications (depending on your choice of contact). For more information please see the Marketing section of this policy;

8.1.2 We may send targeted marketing about our services on third-party online services such as Google, Instagram and Facebook if we believe that you are likely to be interested in using our services based on Your profile. Your consent to receive targeted adverts would have been obtained by these third parties on our behalf;

8.1.3 Surveys: engaging with You for the purposes of obtaining Your views on our Apps or Services.

8.2 We have a contractual obligation: Without Your Personal Information, we cannot provide our Services to You.

8.3 We have a legal obligation: To ensure we are fully compliant with all applicable Data Protection Legislation, Financial legislations such as Anti-Money Laundering and Counter Terrorist Financing Laws, we must collect and store Your Personal Information. We protect against fraud by checking Your identity with Your Personal Information.

8.4 We have a legitimate interest: We may also collect Your Personal Information where we have a legitimate interest to do so, provided that Your rights do not override such interests.

9. How We May Use Your Personal Information

We may Use Your Personal Information we collect to:

- 9.1. Create and manage any accounts You may have with us, verify Your identity, provide our Services, and respond to Your inquiries;
- 9.2. Provide the Services to you;
- 9.3. Process Your transactions to send or receive cryptocurrencies through our Services;
- 9.4. Protect against and prevent fraud, unauthorized transactions, claims and other liabilities;
- 9.5. Provide, administer and communicate with You about products, services, offers, programs and promotions of Myqallet, financial institutions and partners;
- 9.6. Evaluate and improve our business, including developing new products and services;
- 9.7. To target advertisements, newsletter and service updates;
- 9.8. As necessary to establish, exercise and defend legal rights;
- 9.9. As may be required by applicable laws and regulations, including for compliance with Know Your Customers and risk assessment, Anti-Money Laundering, anti-corruption and sanctions screening requirements, or as requested by any judicial process, law enforcement or governmental agency having or claiming jurisdiction over Myqallet or Myqallet's affiliates;
- 9.10. To use data analytics to improve our Services, user experiences and to optimize service delivery;
- 9.11. For other purposes for which we provide specific notice at the time of collection;
- 9.12. To comply with Data Protection Legislation and any other applicable laws.

We will only use Your Personal Information for the stated purposes for which we collected it.

10. Data Security and Retention

10.1. The security of Your Personal Information is important to Myqallet. We are committed to protecting the information we collect. We maintain administrative, technical and physical controls designed to protect the Personal Information You provide, or we collect against loss or theft, as well as against any unauthorized access, risk of loss, disclosure, copying, misuse or modification.

10.2. Other security measures include but not limited to, secure servers, firewall, data encryption and granting access only to employees in order to fulfill their job responsibilities.

10.3. Where You use a password for Your Account, please ensure You do not share this with anyone, and the password is kept confidential at all times. Myqallet shall not be responsible for any loss that arises in relation to Your Account as a result of the disclosure of Your password to any third party.

10.4. We are committed to conducting our business in accordance with the principles set out in this Privacy Policy in order to ensure that the confidentiality of Your Personal Information is protected and maintained. Transmitting information online is not entirely secure. As such, we cannot guarantee that all information provided online is secure. We would take all reasonable steps to ensure that Your Personal Information is secured and well protected.

10.5. We will only retain Personal Information on our servers for as long as is reasonably necessary as long as we are providing Services to You. Where You close Your Account, Your information is stored on our servers to the extent necessary to comply with regulatory obligations and for the purpose of fraud monitoring, detection and prevention.

10.6. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of Your Personal Information, the purposes for which we process Your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. Where we retain Your Personal Information, we do so in compliance with limitation periods under the applicable law.

11. Disclosing Your Personal Information

We may disclose or share Your Personal Information with third parties which include our affiliates, employees, officers, service providers, agents, suppliers, subcontractors as may be reasonably necessary for the purposes set out in this policy. Myqallet only shares Personal Information with external third parties in the following limited circumstances:

11.1. We have Your consent. We require opt-in consent for the sharing of any Personal Information; We share Personal Information with third parties directly authorized by You to receive Personal Information, such as when You authorize a third party application provider to access Your account. The use of Your Personal Information by an authorized third party is subject to the third party's Privacy Policy and Myqallet shall bear no liability for any breach which may arise from such authorization by You;

11.2. We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing Personal Information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures;

11.3. We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to

11.3.1. satisfy any applicable law, regulation, legal process or enforceable governmental request;

11.3.2. enforce applicable terms of service, including investigation of potential violations thereof;

11.3.3. detect, prevent, or otherwise address fraud, security or technical issues;

11.3.4. assess financial and insurance risks; or

11.3.5. protect against imminent harm to the rights, property or safety of Myqallet, its users or the public as required or permitted by law.

11.4. If Myqallet becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide notice before Personal Information is transferred and becomes subject to a different Privacy Policy.

12. Marketing

We may process Your Personal Information in order to contact You or send You marketing content and communication about our products, services or surveys. You may exercise Your right to object to such contact from us or opt out from the marketing content. Please note however that if You opt-out of marketing content, we may still send You messages relating to transactions and our Services related to our ongoing business relationship.

We may ask You for permission to send notifications to You. Our Services will still work if You do not grant us consent to send You notifications.

13. Your Data Protection Rights and Choices

Based on Your location and applicable laws, below are the rights You have as a user in relation to Your Personal Information:

13.1. Right to be informed;

13.2. Right to request access or copies to Your Personal Information by signing into Your Account or contacting us;

13.3. Right to request that Myqallet erase Your Personal Information. You have the right to ask us to erase Your Personal Information. Please note that this is a limited right which applies where the data is no longer required in relation to the purpose for which the data was collected and processed by us, or the processing has no legal justification.

The exceptions to this right include where the applicable law requires Myqallet to retain a historical archive for public interest or such other related purposes, for the establishment, exercise or defense of legal claims or where we retain a core set of Your Personal Information to ensure we do not inadvertently contact You in future where You object to Your data being used for marketing purposes;

13.4. Right to correct or rectify any Personal Information that You provide which may be incorrect, out of date or inaccurate. You also have the right to ask us to complete information You think is incomplete;

13.5. Right to object to the processing of Your Personal Information for marketing purposes. You have a right to ask us not to contact You for marketing purposes by adjusting Your notification preference on the settings page or by opting out via the unsubscribe link in marketing emails we send You;

13.6. Right to object to processing: You have the right to object to the processing of Your Personal Information in certain circumstances. Please note that where You object to us processing Your Personal Information, we might be unable to provide the services to You.

The basis of us processing Your Personal Information is Your consent. You also have the choice at any time to withdraw consent which You have provided.

You also have a choice to deactivate Your Account at any time. You may contact us should You wish to deactivate Your Account at any

time via the Contact Us segment on the app or send us an email to support@myqallet.com.

If You wish to exercise any of the rights set above, please contact us using the contact information provided in the Contact Us segment below. Where we are unsure of Your identity, we might ask You for proof of Your identity for security reasons before dealing with Your request.

14. Cookies

Like many other websites, we use cookies to distinguish You from other users and to customize and improve our services.

Some browsers may automatically accept cookies while some can be modified to decline cookies or alert You when a website wants to place a cookie on Your computer. If You do choose to disable cookies, it may limit Your ability to use our website. For detailed information on the cookies and how we use them see our Cookie Policy.

15. Minor

Myqallet's websites and applications are not directed at persons under the age of eighteen (18) and we do not collect any Personal Information knowingly or directly from minors.

Where You have any belief that Myqallet has mistakenly or unknowingly collected information from a minor, please contact us using the information provided under the Contact Us section to enable investigation and restrict such data.

16. International Data Transfers

Our business is global with affiliates and service providers located around the world. As such, Personal Information may be stored and processed in any country where we have operations. We confirm that we have entered into agreements with these third parties, with adequate contractual protections for Your Personal Information in line with this Privacy Policy.

By submitting Your Personal Information to us, You agree to this transfer, storing and processing. We note that Your Personal Information may be transferred to countries which may not have the same data protection laws as the country You initially provided

Your Personal Information, but whenever we transfer or transmit Your Personal Information internationally, we will ensure or take reasonable steps to ensure Your Personal Information is handled securely in line with the applicable data protection laws and standard contractual clauses.

17. Dispute Resolutions and Filing a Complaint

If You have any complaints regarding this Privacy Policy, please contact us at support@myqallet.com. We will investigate and work on resolutions for complaints and disputes regarding use and disclosure of Personal Information within reasonable time in accordance with this Privacy Policy and in accordance with applicable data protection laws.

All access requests, questions, comments, complaints and other requests regarding the Privacy Policy should be sent to support@myqallet.com. We may request additional details from You regarding Your complaints and keep records of Your requests and resolution.

18. Advertising and Sponsorship

Part of the Site may contain advertising and sponsorship. Advertisers and sponsors are responsible for ensuring that material submitted for inclusion on the Site complies with relevant laws and codes. We will not be responsible to you for any error or inaccuracy in advertising and sponsorship material.

19. Updates to our Privacy Policy

From time to time, we may change, amend or review this Privacy Policy to reflect new services or changes in our Privacy Policy and place any updates on this page. All changes made will be posted on this page and where changes will materially affect You, we will notify You of this change by placing a notice online or via mail. If You keep using our Services, You consent to all amendments of this Privacy Policy.

This Policy was updated on the 10th of February 2023.

Download the app and start investing

Join millions of people globally, to send and receive cryptocurrencies the secure and seamless way. We like to think of ourselves as superheroes here at Qallet

	Company	Product Features	Support & Legal
Join millions of people globally, to send and receive cryptocurrencies the secure and seamless way.	Myqallet	- Send & Receive	Help Center
	About	- Security & Safety	Report a Bug
	Contact	- Speed at Low cost	Privacy & Policy