

# Privacy Policy

Last updated in March 2023.

Your privacy is important to us. It is our 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, and other sites we own and operate as well as mobile applications we offer. Wherever possible, we have designed our website so that you may navigate and use our website without having to provide Personal Data.

Asigna is a software service accessible via a mobile device application and a browser service for the Stacks Network (the "Network") distributed by Asigna LLC. ("Asigna LLC " or "we" or "us" or "our") that enables users to (1) self-custody digital assets; (2) view addresses and information that are part of digital asset networks and broadcast transactions; and (3) additional functionality as Asigna LLC may add to the app from time to time (collectively, the "App" or "Asigna MultiSig"). This Privacy Policy ("Privacy Policy") helps explain how we collect, use, store, and protect your information when you use the App, our developer software, or our website at <https://asigna.io/> (collectively the "Services").

Please also read Asigna Terms of Service (the "Terms"), which describe the terms under which you use the Services.

## 1. Your information and the Blockchain

Blockchains, also known as distributed ledger technology (or simply 'DLT'), are made up of digitally recorded data in a chain of packages called 'blocks. The way these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several 'nodes' which usually replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either.

Accordingly, by design, records of a Blockchain cannot be changed or deleted and are said to be 'immutable'. This may affect your ability to exercise your rights such as your right to erasure ('right to be forgotten'), or your rights to object or restrict processing of your personal data. Data on the Blockchain cannot be erased and cannot be changed. Although smart contracts may be used to revoke certain access rights, and some content may be made invisible to others, it is not deleted.

In certain circumstances, in order to comply with our contractual obligations to you (such as delivery of Tokens) it will be necessary to write certain personal data, such as your Wallet address, onto the Blockchain; this is done through a smart contract and requires you to execute such transactions using your Wallet's Private Key.

In most cases ultimate decisions to (i) transact on the Blockchain using your Wallet, as well as (ii) share the Public Key relating to your Wallet with anyone (including us) rests with you.

IF YOU WANT TO ENSURE YOUR PRIVACY RIGHTS ARE NOT AFFECTED IN ANY WAY, YOU SHOULD NOT TRANSACT ON BLOCKCHAINS AS CERTAIN RIGHTS MAY NOT BE FULLY AVAILABLE OR EXERCISABLE BY YOU OR US DUE TO THE TECHNOLOGICAL INFRASTRUCTURE OF THE BLOCKCHAIN. IN PARTICULAR THE BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON THE BLOCKCHAIN WILL BECOME PUBLICLY AVAILABLE

## **2. How we use Personal Data**

Our primary purpose in collecting information is to help us operate, provide, improve, customize, support, and market our Services. We may use your information to:

To provide, maintain, debug, improve, and enhance our Services.

To understand and analyze how you use our Services and develop new products, services, features, and functionality.

To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, provide you with our newsletter, respond to comments and questions, and otherwise provide customer support.

For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable, or otherwise of interest to you.

To personalize your experience on our Services such as identifying you as a repeat visitor

To facilitate the connection of third-party services or applications

To facilitate transactions such as an exchange

To create de-identified and/or aggregated data to improve for our business purposes, including to improve our Services.

To find and prevent fraud, detect security incidents, and respond to trust and Platform issues that may arise.

For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.

For short-term, transient use.

To contract with service providers to perform services on our behalf, including providing customer service, processing job applications, verifying customer information, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.

For other purposes for which we provide specific notice at the time the Personal Information is collected

We will not use your information for purposes other than those purposes we have disclosed to you, without your permission.

## Use of our Website and Platform

When visiting our website or using the MultiSig Interface, we may collect and process personal data. The data will be stored in different instances.

- We connect the Wallet to the web app to identify the user via their public Wallet address. For this purpose, we process:
  - Public Wallet address and
  - Wallet Connect connection data.
- When you create a new MultiSig, we process the following data to compose a Transaction based on your entered data to be approved by your Wallet:
  - Your public Wallet address
  - Account balance
  - Smart contract address of the MultiSig
  - Addresses of externally owned accounts and
  - User activity
- When you create a Profile for a new MultiSig, we process the following data for the purpose of enabling you to view your MultiSig after creation as well as enabling you to view all co-owned multi-Signature wallets:
  - Your public Wallet address and
  - Account balance
- When you create a Profile for an existing MultiSig for the purpose of allowing you to view and use them in the MultiSig Interface, we process your
  - Public Wallet address
  - MultiSig balance
  - Smart contract address of the MultiSig
  - MultiSig owner's public Wallet addresses
- When you initiate a MultiSig Transaction, we process the following data to compose the Transaction for you based on your entered data:
  - Your public Wallet address and
  - Smart contract address of the MultiSig
- When you sign a MultiSig Transaction, we process the following data to enable you to sign the Transaction using your Wallet:
  - MultiSig balance
  - Smart contract address of MultiSig
  - MultiSig owner's public Wallet addresses
- To enable you to execute the transaction on the Blockchain we process:
  - Your public Wallet address.
  - MultiSig balance
  - Smart contract address of the MultiSig
  - MultiSig owner's public Wallet addresses
  - Transactions signed by all MultiSig owners.

- When we collect relevant data from the Blockchain to display context information in the MultiSig Interface we process:
  - Your public Wallet address
  - Account balance
  - Account activity
  - MultiSig owner's public wallet addresses
- When we decode Transactions from the Blockchain for the purpose of providing Transaction information in a conveniently readable format, we process:
  - Your public Wallet address
  - Account balance
  - Account activity
- When we maintain a user profile to provide you with a good user experience through Profiles and an address book we process:
  - Your public Wallet address
  - Label
  - Smart contract address of the MultiSig
  - MultiSig owner's public wallet addresses
  - Last used Wallet (for automatic reconnect),
  - Chain id
  - Selected currency
  - Address format

The legal base for all these activities is the performance of the contract we have with you (GDPR Art.6.1b).

THE DATA WILL BE STORED ON THE BLOCKCHAIN. GIVEN THE TECHNOLOGICAL DESIGN OF THE BLOCKCHAIN, AS EXPLAINED IN SECTION 2, THIS DATA WILL BECOME PUBLIC AND IT WILL NOT LIKELY BE POSSIBLE TO DELETE OR CHANGE THE DATA AT ANY GIVEN TIME.

## **Tracking**

- We may store the following personal data to analyze your behavior:
  - IP Address,
  - Session tracking,
  - User behavior,
  - Wallet type,
  - Device and browser user agent,
  - User consent,
  - Operating system,
  - Referrers,
  - User behavior, such as: subpage, duration, and revisit, the date and time of access,

This data may be processed in order to improve the product and user experience.

The lawful basis for this processing is your consent (GDPR Art.6.1a) when agreeing to accept cookies.

- We conduct technical monitoring of your activity on the platform in order to ensure availability, integrity and robustness of the service. For this purpose, we process your:
  - IP addresses,
  - Metadata and communication data,
  - Website access and
  - Log data

The lawful basis for this processing is our legitimate interest (GDPR Art.6.1f) in ensuring the correctness of the service.

### **When Participating in User Experience Research (UXR)**

When you participate in our user experience research we may collect and process some personal data. This data may include:

- Your name
- Your email
- Your phone model
- Your occupation
- Range of managed funds

In addition, we may take a recording of you while testing the MultiSig for internal and external use. The basis for this collection and processing is our legitimate business interest in monitoring and improving our services.

The lawful basis for this processing is your consent as provided before participating in user experience research.

### **Publishing the app**

Publishing the app on Google Play Store.

We process the following information to enable you to download the app on smartphones running Android:

- Google account and
- E-mail address

Publishing the app on Apple App Store

We process the following information to enable you to download the app on smartphones running iOS:

- Apple account and
- E-mail address

The lawful basis for these two processing activities is the performance of the contract we have with you (GDPR Art.6.1b).

## Use of the app\*

- We provide the app to you to enable you to use it. For this purpose, we process your:
  - Mobile device information,
  - HTTP request caches and
  - HTTP request cookies
- In order to update you about changes in the app, we need to send you push notifications. For this purpose, we process your:
  - Transactions executed and failed,
  - Assets sent,
  - Assets received.
- To provide support to you and notify you about outage resulting in unavailability of the service, we process your:
  - Pseudonymized user identifier
- In order to provide remote client configuration and control whSTXer to inform about, recommend or force you to update your app or enable/disable certain app features we process your:
  - User agent,
  - app information (version, build number etc.),
  - Language,
  - Country,
  - Platform
  - Operating system
  - Browser
  - Device category
  - User audience
  - User property
  - User in random percentage
  - Imported segment.
  - Date/time
  - First open
  - Installation ID

\*For all these activities, we rely on the legal base of performance of a contract (GDPR Art.6.1b) with you.

- To report errors and improve user experience we process your:
  - User agent info (Browser, OS, device),
  - URL that you were on (Can contain MultiSig address) and
  - Error info: Time, stacktrace

We rely on our legitimate interest (GDPR Art.6.1f) of ensuring product quality.

## Other uses of your Personal Data

We may process any of your Personal Data where it is necessary to establish, exercise, or defend legal claims. The legal basis for this is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Further, we may process your Personal data where such processing is necessary in order for us to comply with a legal obligation to which we are subject. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights.

## **4. Use of Third-Party Applications**

### **Blockchain**

When using the MultiSig your smart contract address, MultiSig Transactions, addresses of signer accounts and STX balances and token balances will be stored on the Blockchain. See section 2 of this Policy.

THE INFORMATION WILL BE DISPLAYED PERMANENTLY AND PUBLIC, THIS IS PART OF THE NATURE OF THE BLOCKCHAIN. IF YOU ARE NEW TO THIS FIELD, WE HIGHLY RECOMMEND INFORMING YOURSELF ABOUT THE BLOCKCHAIN TECHNOLOGY BEFORE USING OUR SERVICES.

### **Amazon Web Services**

We use **Amazon Web Services (AWS)** to store log and database data.

### **Mobile app stores**

Asigna mobile apps are distributed via **Apple AppStore** and **Google Play Store**. They most likely track user behavior when downloading apps from their stores as well as when using apps. We only have very limited access to that data. We can view aggregated statistics on installs and uninstalls. Grouping by device type, app version, language, carrier, and country is possible.

### **Fingerprint/Touch ID/ Face ID**

We enable the user to unlock the MultiSig mobile app via biometrics information (touch ID or face ID). This is a feature of the operating system. We do not store any of this data. Instead, the API of the operating system is used to validate the user input. If you have any further questions you should consult with your preferred mobile device provider or manufacturer.

### **Google Firebase**

We use the following **Google Firebase** services:

- Firebase Cloud Messaging: Provide updates to the user about changes in the mobile apps via push notifications.
- Firebase remote config: Inform users about, recommend or force user to update their mobile app or enabling/disabling certain app features. These settings are global for all users, no personalization is happening.

- Firebase crash reporting: Report errors and crashes to improve product and user experience.

### **Xverse and Hiro**

Xverse and Hiro is used to connect wallets to network using end-to-end encryption by scanning a QR code. We do not store any information collected by Xverse or Hiro.

### **Beamer**

We use **Beamer** providing updates to the user about changes in the app. Beamer's purpose and function are further explained under the following link <https://www.getbeamer.com/showcase/notification-center>.

We do not store any information collected by Beamer.

### **Data Query**

We use Stacks Explorer API to query public blockchain data from our backend services. All MultiSigs are monitored, no personalization is happening, and no user IP addresses are forwarded. Personal data processed are:

- Your smart contract address of the MultiSig.
- Transaction id/hash
- Transaction data

### **Internal communication**

We use the following tools for internal communication.

- [Google Workspace](#)
- [Notion](#)

## **5. Sharing Your Personal Data**

We may pass your information to our Business Partners, administration centers, third party service providers, agents, subcontractors, and other associated organizations for the purposes of completing tasks and providing our services to you.

In addition, when we use any other third-party service providers, we will disclose only the personal information that is necessary to deliver the service required and we will ensure that they keep your information secure and not use it for their own direct marketing purposes. In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganization, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.



## 6. Transferring Your data outside of the EU

Wherever possible we will choose service providers based in the EU. For those outside the EU, wherever possible we will configure data to be inside the EU. We concluded the new version of the Standard Contractual Clauses with these service providers (2021/914).

Service providers in the US:

- Amazon Web Service Inc.
- Google LLC
- Joincube Inc. (Beamer)
- Notion Labs Inc.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN, AS EXPLAINED ABOVE IN THIS POLICY, THE BLOCKCHAIN IS A GLOBAL DECENTRALIZED PUBLIC NETWORK AND ACCORDINGLY ANY PERSONAL DATA WRITTEN ONTO THE BLOCKCHAIN MAY BE TRANSFERRED AND STORED ACROSS THE GLOBE.

## 7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Your Rights based on the Privacy Policy

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'). We explain these below. You can find out more about the GDPR and your rights by accessing the [European Commission's website](#). If you wish to exercise your data subject rights, please contact us by post or at [admin@assigna.io](mailto:admin@assigna.io)

### Right Information and access

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Privacy Policy intends to provide the information. Of course, if you have any further questions, you can contact us on the above details.

### Right to rectification

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing

of that information. The accuracy of your information is important to us. If you do not want us to use your Personal Information in the manner set out in this Privacy Policy or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Information, please contact us at the above details.

### **Right to data deletion**

You have the general right to request the deletion of your personal information in the following circumstances:

- The personal information is no longer necessary for the purpose for which it was collected.
- You withdraw your consent-to-consent based processing and no other legal justification for processing applies.
- You object to processing for direct marketing purposes.
- We unlawfully processed your personal information; and
- Deletion is required to comply with a legal obligation that applies to us.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN WE MAY NOT BE ABLE TO ENSURE THAT YOUR PERSONAL DATA IS DELETED. THIS IS BECAUSE THE BLOCKCHAIN IS A PUBLIC DECENTRALIZED NETWORK AND BLOCKCHAIN TECHNOLOGY DOES NOT GENERALLY ALLOW FOR DATA TO BE DELETED AND YOUR RIGHT TO ERASURE MAY NOT BE ABLE TO BE FULLY ENFORCED. IN THESE CIRCUMSTANCES WE WILL ONLY BE ABLE TO ENSURE THAT ALL PERSONAL DATA THAT IS HELD BY US IS PERMANENTLY DELETED.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information.
- Complying with a legal obligation under EU or other applicable law.
- The performance of a task carried out in the public interest.
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defense of legal claims.

### **Right to restrict processing and right to object to processing**

You have a right to restrict processing of your personal information, such as where:

- you contest the accuracy of the personal information.
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information.
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defense of legal claims.

You also have the right to object to processing of your personal information under certain circumstances, such as where the processing is based on your consent, and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right.

HOWEVER, WHEN INTERACTING WITH THE BLOCKCHAIN, AS IT IS A PUBLIC DECENTRALIZED NETWORK, WE WILL LIKELY NOT BE ABLE TO PREVENT EXTERNAL PARTIES FROM PROCESSING ANY PERSONAL DATA WHICH HAS BEEN WRITTEN ONTO THE BLOCKCHAIN. IN THESE CIRCUMSTANCES WE WILL USE OUR REASONABLE ENDEAVORS TO ENSURE THAT ALL PROCESSING OF PERSONAL DATA HELD BY US IS RESTRICTED, NOTWITHSTANDING THIS, YOUR RIGHT TO RESTRICT TO PROCESSING MAY NOT BE ABLE TO BE FULLY ENFORCED.

### **Right to data portability**

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

### **Right to freedom from automated decision-making**

As explained above, we do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

### **Right to object to direct marketing ('opting out')**

You have a choice about whether you wish to receive information from us. We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above)
- you have otherwise given your prior consent (such as when you download one of our guides)

You can change your marketing preferences at any time by contacting us on the above details. On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You may also opt-out at any time by contacting us on the below details.

Please note that any administrative or service-related communications (to offer our services or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our website or as part of a contractual relationship we may have with you.

## **Right to request access**

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

## **Right to withdraw consent**

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

## **Raising a complaint about how we have handled your personal data.**

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

## **Right to lodge a complaint with a relevant supervisory authority**

We encourage you to contact us at [admin@assigna.io](mailto:admin@assigna.io) if you have any privacy related concerns. Should you disapprove of the response we have provided you, you have the right to lodge a complaint with our supervisory authority, or with the data protection authority of the European member state you live or work in.

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.

## **9. Storing Personal Data**

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this policy.

However, we may retain your Personal Data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **10. Changes to this Privacy Policy**

We may modify this privacy policy at any time to comply with legal requirements as well as developments within our organization. When we do, we will revise the date at the top of this page. Each visit or interaction with our services will be subject to the new privacy policy. We encourage you to regularly review our privacy policy to stay informed about our data protection policy. Unless we implement profound changes that we proactively notify you about, you acknowledge that it is your responsibility to review our privacy policy to be aware of modifications. If you do not agree to the revised policy, you should discontinue your use of this website.

# CONTACT US

To resolve a complaint regarding the Services or to receive further information regarding use of the Services, please contact us at:

Asigna LLC  
[admin@asigna.io](mailto:admin@asigna.io)