

Privacy Policy

Truhoma platform

Version 3.0

Effective date: September 26, 2021

This Privacy Policy constitutes a part of Terms of Use between you (hereinafter referred to as “you” or “your”) and TRUHOMA, inovativni zavod za pomoč socialno ogroženim, Letališka cesta 33F, 1000 Ljubljana, ID: 8864420000, VAT: 50456806 (“Truhoma” “we” and “us”) (the “Terms”). The terms used in this Privacy Policy shall have the same meanings as in the Terms except as otherwise provided herein.

This Privacy Policy explains how TRUHOMA and its affiliates collect, use, process, disclose, share, transfer, and protect personal information obtained through your accessing or use of the Platform or the Services. When we ask for certain personal information from users, it is because we are required by applicable laws or government orders to collect such information or it is relevant for our specified purposes.

Please carefully read the full content of this Privacy Policy. When accessing the Platform and/or Services, regardless of whether or not you register for or log in the Services, you acknowledge, understand, and consent to all articles described in this Privacy Policy. We will not use your personal information for any purpose not covered in this Privacy Policy or the Terms (including any other business rules of ours) without prior notification to you and your consent.

The latest Privacy Policy has incorporated elements from the General Data Protection Regulation (GDPR) as we act in accordance with its personal information processing rules within the European Economic Area (EEA). We utilize standard contract clauses, rely on the European Commission's adequacy decisions about certain countries, as applicable, and obtain your consent for these data transfers to third countries if required by applicable laws.

1. INFORMATION WE COLLECT

The followings are the types of information we collect when you register for and use the Services and/or Platform:

1.1 Information You Provide to Us When Registering

When you create an account on the Platform, you provide us with your email address, name, home/company address, email, telephone number and other information to help us identify you (“Identification Information”).

1.2 Information We Collect as You Use the Services

1.2.1. Service Usage Information

Through your access to and use of the Services, we may monitor and collect tracking information related to usage including but not limited to your phone number, access date and time, device type and device identification, operating system and hardware setting, browser type, and information derived from network operator, IP address, GPS, base station and WLAN (“Service Usage Information”). This information may be directly obtained by TRUHOMA or through third-party service providers. The collection of Service Usage Information helps our systems to ensure that our interface is accessible for users across all platforms and can aid during criminal investigations.

1.2.2. Donation Information

When you make a donation through the Services, we will collect the financial information necessary to process your donation, including your wallet address and the amount and recipient of your donation (“Donation Information”). We collect such Donation Information to keep track of your donation and any other purposes disclosed in this Privacy Policy.

1.2.3. Communication Information

You agree that, for the purposes disclosed in this Privacy Policy, we are entitled to collect and use the information contained in or related to the communication that you send to us or generated through your use of the Services (“Communication Information”), which includes:

all messages, requests or other information you send in the course of your contact with us;
all communications and file attachments in connection with your donations or other data generated primarily through your communications with other users on the Platform.

2. HOW WE COLLECT INFORMATION

2.1 Information We Automatically Collects

Most of the personal information that we collect is directly provided by you. In the following situations, we will collect and process the information about you:

- where you register for, log in or access the Platform, or use the Services;
- where you voluntarily complete any user survey or provide feedback to us via email or any other channel;
- where you use cookies of the browser or software in visiting or using our Platform;
- other situations where we may automatically collect your information as mentioned in this Privacy Policy or our Terms (including our platform rules, the same below).

2.2 Information Collected from the Third-party Sources

We may collect information about you from third-party sources, including but not limited to, the following channels:

- public databases, credit bureaus and ID verification partners;
- blockchain data;
- social medial partners.

2.3 Anonymized and Aggregated Data

Anonymization is a data processing technique that removes or modifies personal information so that it cannot be associated with a specific individual. Except for this section, none of the other provisions of this Privacy Policy applies to anonymized or aggregated personal data (i.e. information about our Users that we combine together so that it no longer identifies or references an individual User).

We may use anonymized or aggregate user data for any business purpose, including to better understand Users’ needs and behaviors, improve our products and services, conduct business intelligence and marketing, and detect security threats. We may perform our own analytics on anonymized data or enable analytics provided by third parties.

3. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect about you for the following purposes or in the following ways:

3.1 To Provide and Maintain the Services

We use the information collected to deliver, maintain and provide better the Services (including but not limited to processing donations) and verify Users’ identities.

We use the IP address and unique identifiers stored in your device’s cookies to help us authenticate your identity and activities and provide the Services. Given our legal obligations and system requirements, we cannot provide you with all or some of the Services without data like Identification Information, Service Usage Information, Communication Information, and Donation Information.

3.2 To Protect Our Users

We use the information collected to protect our platforms, users’ accounts, and archives.

We use IP addresses and cookies to protect against automated abuse such as spam, phishing, and Distributed Denial of Service (DDoS) attacks.

3.3 To Comply with Legal and Regulatory Requirements

With respect to the privacy and security of personal information, we will use the information in compliance with our legal obligations, government requests, and reasonable user-generated inquiries. In cases where it is strictly necessary, such as to protect the vital interests of the users or other natural persons, to fulfill the purpose of public interest, to pursue our reasonable interests (but not to damage the interests of the users), we may process your personal information without your consent. Except for the situations stated in this Privacy Policy or the TERMS, we will not disclose or provide any of your personal information to third parties without a review from our legal team and/or prior consent from the user.

3.4 For Measurement, Research and Development Purposes

We actively measure and analyze data to understand the way you use and interact with the Services. This review activity is conducted by our operation teams to continually improve our Platforms' performance and to resolve issues with the user experience. In addition, we use such information to customize, measure, and improve the Services and the content and layout of the Platform, and to develop new services. We continuously monitor activity information within our systems and our communications with users to look for and quickly fix problems.

3.5 To Communicate with You

We use personal information collected, like your phone number or email address to interact with you directly when providing user support on a ticket or to keep you informed on logins, donations, account security and other aspects. Without collecting and processing your personal information for confirming each communication, we will not be able to respond to your submitted requests, questions, and inquiries. All direct communications are properly kept by us or the service provider designated by us, to be reviewed for accuracy, to be kept as evidence, or to be used to perform other statutory or contractual obligations.

3.6 To Enforce Our Terms and Other Agreements

The collected information is also used to continually and actively enforce our Terms and other agreements with our Users, including but not limited to reviewing, investigating, and preventing any potentially prohibited or illegal activities that may violate the foregoing provisions, or disclose the relevant information to a third party in accordance therewith.

We reserve the right to suspend or terminate provision of any Services to any User found to be engaged in activities that violate our Terms and other agreements with our Users.

3.7 For Marketing and Advertising

We may share your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising.

3.8 For Any Other Purpose

We may disclose your personal information for any other purpose you consent to.

4. MARKETING

We may send you email newsletters containing updates and information about the fundraising campaigns happening on the Platform. Where required by law, for example if you are a user in the EU, we will only send you newsletters if you consent to us doing so at the time you provide your Personal Data. If you agree to receive the above newsletter, you can choose to receive it at any time in the future. You have the right to ask us at any time to stop contacting you for marketing purposes or to send relevant information to you. If you do not want to be contacted for marketing purposes in the future, please click on the unsubscribe link in the bottom of the marketing email and submit your request to unsubscribe.

5. HOW WE STORE AND PROTECT USER DATA

We have kept your personal information safe using fault-tolerant secured storage with industry standard encryption and implemented a number of security measures to ensure that your information is not lost, abused, or altered, including, but not limited to:

- **Physical Measures**

Materials containing your personal information will be stored in a locked place.

- **Electronic Measures**

Computer data containing your personal information will be stored in the computer systems and storage media that are subject to strict log-in restrictions.

- **Management Measures**

Only authorized employees are permitted to come into contact with your personal information and such employees must comply with our internal confidentiality rules for personal data. We have also imposed strict physical access controls to buildings and files.

- **Technical Measures**

Encryption technology such as PCI Scanning and Secured Sockets Layered Encryption may be used to transmit and store your personal information. We use various currently available general security technologies and supporting management systems to minimize the risks that your information may be disclosed, damaged, misused, accessed without authorization, disclosed without authorization, or altered.

- **Other Measures**

Our web server is protected by the "firewall".

Please note that it is impossible to guarantee 100% security of information. As such, we request that you understand the responsibility to independently take safety precautions to protect your own personal information. You agree that we shall not be liable for any information leakage and other losses not caused by our intention or gross negligence, including but not limited to hacker attack, power interruption, or unavoidable technical failure, to the maximum extent permitted by law.

If you suspect that your personal information has been compromised, especially account and/or password information, please lock your account and immediately contact our support team. Unless otherwise stipulated by law or the Terms, you agree that we have the right but not the obligation to retain all the collected personal information for the duration of your account for 5 more years after the account is closed.

6. TRANSFERS OF PERSONAL INFORMATION

You understand that we have the right to have all or some of the collected personal information transferred to or stored in other countries or regions than your country of nationality, your country of residence, or the country where the server is, without your specific consent, under the following circumstances:

- if it is necessary to protect, process, analyze, reasonably use the personal information;
- if it is necessary to enforce the TERMS and other agreements with our Users;
- if it is necessary for the public interest;
- if it is necessary to establish, exercise or defend the rights of us, our partners, or other Users;
- other circumstances required by law or government orders.

7. COOKIES

7.1 What Are Cookies?

Cookies are small amounts of data that are sent to your browser and stored on your computer's hard drive to collect standard internet log information and visitor behavior information. When you visit the Platform, we can automatically collect information from you through cookies or similar technologies.

7.2 How Do We Use Cookies?

We use cookies in a range of ways to make your experience on the Platform more enjoyable, including but not limited to:

- to keep you signed in;
- to record your habits and preferences when browsing the Platform;
- to record our performance and verify the effectiveness of online advertising through Google Stats with cookies.

7.3 How to Manage Cookies?

Most browsers are preset to accept cookies. You can adjust your browser setting to prevent cookies or to notify you as soon as cookies are loaded. However, stopping all cookies might mean that you cannot access or use some features of the Platform. Please see more information [here](#).

8. Your rights in relation to collected personal data

To ensure transparent and lawful processing of personal data and to protect privacy, everyone has the right to access personal data, the right to request rectification of personal data, the right to request the erasure of personal data, the right to request the restriction of processing of personal data, the right to withdraw the consent to process personal data, the right to data portability and the right to lodge a complaint with a supervisory authority. Below all rights are described in detail.

We hope to ensure that you are fully aware of the data protection rights that you enjoy. Unless otherwise required by law or government orders, each User has the following rights:

8.1 Right to access personal data

You may request confirmation as to whether or not your personal data is being processed by Us at any time. Where that is the case, you may further request information about the purposes of the processing, the categories of personal data concerned, the persons who process your personal information, retention periods or criteria used to determine that period, the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data, right to object the processing of personal data, the right to lodge a complaint with a supervisory authority, the source of personal data, when personal data are not collected from you and about the existence of automated decision-making.

8.2 Right to Rectification

When personal data processed by Truhoma are incomplete or inaccurate, you may request to rectify such personal data without undue delay. You also have the right to ask us to complete the personal information that you deem incomplete within a reasonable limit.

8.3 Right to Erasure (Right to be Forgotten)

You have the right to request the erasure of your personal data under certain circumstances. You may request the erasure of personal data, processed by Truhoma, in its entirety when:

- The personal data are no longer necessary in relation to the purposes for which they were collected;
- You have withdrawn your consent to the processing of personal data and no other legal ground for the processing exists;
- You have objected to the processing of personal data provided that all conditions set in applicable law are met;
- The personal data have been unlawfully processed by Truhoma; or
- The personal data have to be erased for compliance with Truhoma's legal obligation.

8.4 Right to Restriction of Processing

Under certain circumstances as required by law or as specifically reminded by us, you have the right to request us to restrict the processing of your personal information; however, you understand that such restriction of the processing may prevent us from providing you with some of the Services. You may restrict the processing of your personal data when:

- Personal data processed is incorrect provided that inaccurate data pertains to a period enabling the controller to verify the accuracy of the personal data;
- The processing of personal data is unlawful; or
- Truhoma no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

8.5 Right to Object

Under certain circumstances as required by Law or as specifically reminded by us, you have the right to object to the processing of your personal information; however, you understand that such objection of the processing may prevent us from providing you with some of the Services.

8.6 Right to Data Portability

You may request at any time to receive your personal data processed by Truhoma in a structured, commonly used and machine-readable format. You may at any time transmit thus obtained personal data to another controller or request to have personal data transmitted directly to another controller.

8.7 Right to lodge a complaint with the national authority

If you believe, that Truhma processes your personal data contrary to relevant provisions of applicable law, you may lodge a complaint with Slovenian national authority Informacijski pooblaščenec (Dunajska cesta 22, 1000 Ljubljana, email: gp.ip@ip-rs.si phone number: 012309730, website: www.ip-rs.si).

9. PRIVACY POLICIES OF OTHER WEBSITES

If you visit other third-party platforms or partner's websites, apps via the links on the Platform, you should agree with and abide by their separate and independent privacy policies. We are not responsible for the content or the activities therein.

10. MODIFICATIONS TO THIS PRIVACY POLICY

From time to time, We may revise this Privacy Policy to reflect changes in Law or our personal-data collection, processing, and use practices. Changes to this Privacy Policy will be announced by posting on our website. You shall regularly review the Privacy Policy and pay attention to its revisions. If you do not agree with the revised content, you shall stop accessing the Platform immediately. When an updated version of the Privacy Policy is released, your continued access to the Platform means that you agree to the updated content and agree to abide by the updated Privacy Policy. Truhoma reserves the right to modify this Privacy Policy at any time. Modified Privacy Policy is applicable as of the publication on the Website and governs further processing of collected personal data and processing of personal data collected after modified Privacy Policy became applicable. We recommend that before you provide any personal information to Us you read the current version of this Privacy Policy and familiarise yourself with any changes or amendments to this Privacy Policy. We may at that time request to consent to the processing of personal data in accordance with the modified Privacy Policy. The last date this Privacy Policy was revised is set forth below.

11. CONTACT US

We are committed to respecting the freedoms and rights of all our users. Should have any questions or concerns regarding this Privacy Policy, or if you would like to file a data protection request, or if you have any questions or requests, please contact us via email at privacy@truhoma.com.