Privacy Policy

Last updated: April 13, 2023

Welcome to Watugot! Please carefully read this Privacy Policy before accessing the application available at [www.watugot.net](http://www.watugot.org/) and pi://watugot.net (hereinafter collectively the “Website” or the “App”).

The App is owned and operated by Watugot Mobile Applications LLP, a company formed and operating in accordance with the laws of the Republic of India. Any reference in this Privacy Policy to “the Company,” “we,” “us,” or “our” refers to Watugot Mobile Applications LLP, and any reference to “you,” “your,” or “user” refers to the individual who registers an account on the App.

This Privacy Policy provides information on how we collect, use, share and secure your Personal Data when you use the App and your rights relating to your Personal Data.

We process all Personal Data we collect from you in compliance with the Personal Data protection laws of the jurisdictions where we offer the App, including but not limited to the European Union General Data Protection Regulation 2016/679 (EU GDPR) and the US Privacy Laws.

Please do not use the App if you do not agree with our privacy practices as outlined in this Privacy Policy.

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# Scope

This Privacy Policy only applies to individuals who use the App and those who consent to receive marketing communication from us. This Privacy Policy does not govern the use of your Personal Data by any third parties to whom you directly provide your Personal Data.

# Definitions

Whenever used in this Privacy Policy, the following words shall have the meaning as defined below:

|  |  |
| --- | --- |
| ‘Buyer’ | means an App account holder who places an Order/purchases a Product listed on the App. |
| ‘Controller,’ ‘Personal Data,’ ‘Processor,’ and ‘Processing’  | shall have the meaning defined in Article 4 of the EU General Data Protection Regulation 2016/679. |
| ‘Data Subject’ | means a natural person whose Personal Data is processed by the Company or its Processors. |
| ‘Listing’ | means an offer for the sale of a Product published by a User on the App. |
| ‘Non-Pioneer’ | means a User who uses the App outside the Pi Network. |
| ‘Order’ | means a Buyer’s offer to purchase a Product listed on the App.  |
| ‘Order ID’ | refers to the unique code displayed to Buyers when they checkout with their selected Product from a Store.   |
| ‘Party’ or ‘Parties’ | means the user/s who enter into a Transaction with each other. |
| ‘Pi’ or ‘Pi token’ | refers to the digital currency of the Pi Network. |
| ‘Pioneer’ | means a user with a Pi Network account.  |
| ‘Pi Payment’ | means the payments in Pi tokens either between two Users or between a User and the Company in accordance with the provisions of this Agreement. |
| ‘Product’ | means a tangible item or a service listed on the App.  |
| ‘Sale Price’ | means the price at which a Product is offered for sale on the App by a Store or Seller (as applicable). |
| ‘Seller’ | means a Pioneer who offers Products for sale in Pi tokens through the App. |
| ‘Service Fee’ | means the fee the Company charges the Seller for a Product sale concluded through the App. The Service Fee is a fixed percentage of the Sale Price specified on the Listing. |
| ‘Store’ | refers to the online Store on the App that a Subscriber creates. |
| ‘Subscriber/s’ | means a Pioneer who subscribes to one of the subscription plans offered by the Company.   |
| ‘Subscription Fee’  | means the fee the Subscriber pays the Company for the selected subscription plan.  |
| ‘Transaction/s’ | means any agreement between Users to sell or buy a Product listed on the App.  |
| ‘User’ | means any App User, including a Subscriber, Buyer, or Seller.  |
| ‘User Content’ | refers to any content posted/uploaded by a User on the App as defined in Section 9 of our Terms and Conditions. |

# Controller

The Company is the Controller of the Personal Data collected when you use the App or consent to receive marketing communication from us.

You can write to us at:

Watugot Mobile Applications LLP

Building No. 5/2224,

Vaishnavi Kasaba,

Ashokapuram PO Calicut Kerala 673001

India

Email: info@watugot.net

# Personal Data Collection and Use

We collect and use your Personal Data when you interact with the App, when you consent to receive marketing material from us, and/or when you contact us. The type of Personal Data we collect depends on how you use the App or interact with us. You may decline to provide any Personal Data when requested by us; however, you understand that your refusal to provide any Personal Data needed for the provision of the App will result in you being unable to use the App.

* 1. **What Personal Data do we collect from you?**

The Personal Data we collect from you includes but is not limited to your:

* Full name;
* Email address;
* Phone number;
* Profile photo;
* Pi Username (if you use the App on the Pi Network);
* Pi wallet’s public address (if you use the App on the Pi Network);
* Content of any messages you send/receive from other users through the App;
* Content of all communication you have with the Company;
* Transaction information (including Sale Price, Payment ID, and any communication between the Parties);
* Information that you provide us when you participate in our surveys or promotions;
* Your log data, including your browser type, time and pages you visit, your IP address;
* Device data, including the model and make of your device, operating system, and unique device identifiers;
* Location data;
* Information that we collect through the use of cookies and other tracking technologies.
	1. **How do we collect and use your Personal data?**
		1. Account Registration Data

When you sign up for an account on the App and create your profile, we collect and use your Personal Data to manage your account creation, including your:

* Full name;
* Email address;
* Phone number;
* Profile photo;
* Pi Username;
* Pi wallet’s public address; and
* Location data.
	+ - 1. Purpose of Processing

We use the above Personal Data to:

* Create your account on the App;
* Authenticate you on the App using your Pi account username;
* Enable you to send/receive Pi Payments through the App;
* Communicate with you as and when required;
* Perform important business functions, including but not limited to data analysis, audits, feature development, and expanding our business activities;
* Display location-relevant data, such as showing Stores and Sellers to Buyers in the area and enabling Stores and Sellers to define the radius from their current location.
* Assert our rights and enforce our Agreement with you; and
* Prevent fraud.
	+ - 1. Legal Basis

Depending on the purpose of the processing, we may rely on your consent, the performance of a contract or our legitimate interest as the legal bases for processing your account registration data. You have the choice to refuse the collection of your location data when requested, but you acknowledge and agree that disallowing access to your location data will restrict your ability to use the App.

* + - 1. Retention Period

We retain this Personal Data for the duration your account is active on the App. Please note that we may be able to retain some elements of this Personal Data even after the termination of your account if we have another lawful basis for processing such Personal Data.

* + 1. Transactions and Pi Payment Data

When you become a Subscriber, purchase any promotions, enter into any Transactions in Pi, or place orders with Stores, we will process some transaction and payment data.

* + - 1. Data Collected
* The details of the Order placed by Buyers through the App;
* The status of the Order in the Store account;
* The Sale Price of the Product sold/purchased in Pi (if applicable);
* The subscription plan purchased from the Company (if applicable);
* The specific promotion purchased by a Store or a Seller;
* The payment ID for any Pi Payment.

Please note that we do not collect any sensitive information.

* + - 1. Purpose of Processing

We process the above data to:

* Fulfil our Agreement with you, including providing access to the App according to your subscription plan;
* Share the Seller/Store details with Buyers and vice versa, enabling both Parties to fulfil their respective obligations and communicate with each other (as applicable);
* Facilitate Pi Payments according to our Agreement with you;
* Conduct internal business functions, including business accounting; and
* Detect and prevent fraud.
	+ - 1. Legal Basis

We rely on the performance of a contract with you as a legal basis for processing the above data.

* + - 1. Retention Period

We retain this data for the entire duration that your account is active on the App. You understand that we may be able to retain some of this data even after the termination of your account if we have another lawful basis for processing. Please note that your Pi Payment data is also stored in the Pi Blockchain, which is publicly available. We do not have any control over the retention period of your Pi Payment data on the Pi Blockchain.

* + 1. User Content

When you post your User Content on the App, we collect the information contained in your User Content.

* + - 1. Data Collected
* Listing descriptions and images; and
* Content of messages you send to or receive from other users.
	+ - 1. Purpose of Processing

We use the data we collect from your User Content to:

* Make relevant User Content available on the App;
* Detect and prevent any fraud or other similar unauthorised activities on the App.
	+ - 1. Legal Basis

We rely on the performance of a contract with you as a legal basis for processing data collected from your User Content.

* + - 1. Retention Period

We retain your User Content data for the entire duration that your account is active on the App. Please note that we may be able to retain some of your User Content data even after the termination of your account if we have another lawful basis for processing such Personal Data.

* + 1. Enquiries, Support Requests and Feedback

We also collect your Personal Data when you send us your feedback, your enquiries, or support requests by email through the contact form on the App or live chat.

* + - 1. Data Collected
* Your full name;
* Your email address (depending on the medium of communication);
* Any other Personal Data contained in your communication.
	+ - 1. Purpose of Processing

We process the above Personal Data to:

* Offer you support services;
* Follow-up on sales enquiries we receive from you; and and
* Facilitate and improve our App features and functionality.
	+ - 1. Legal Basis

We rely on our legitimate interest as a legal basis for processing the above data.

* + - 1. Retention Period

We retain this data for the entire duration that your account is active on the App. If you are not an account holder, we will retain this data for up to six months from the date of your last communication with us. Please note that we may be able to retain some of your data even after the termination of your account if we have another lawful basis for processing such Personal Data.

* + 1. Marketing Data

If you consent to receive marketing communication from us, we will process your Personal Data as outlined hereunder.

* + - 1. Data Collected
* Your full name; and
* Email address;

Please note that we may make use of third-party tools that assist us with optimising our email campaigns. These tools may collect additional data from you to track how you interact with our emails, such as:

* Your device's operating system, and
* Your country for language selection.
	+ - 1. Purpose of Processing

We process this Personal Data to:

* Send you promotional offers, surveys and other direct marketing material; and
* For our internal business purposes, such as data analysis and business development.
	+ - 1. Legal Basis

We rely upon your consent as the legal basis for processing. Please note that you can opt out of receiving marketing communication anytime by clicking the unsubscribe button in the marketing emails.

* + - 1. Retention Period

Personal data that is processed on the legal basis of your consent may be retained until such time that you withdraw your consent.

* + 1. Cookies

We collect some data from you through cookies, pixels, and tags (collectively “Cookies”) when you accept cookies on our App.

* + - 1. Data Collected
* Your log data, including your browser type, time and pages you visit, your IP address; and
* Device data, including the mode and make of your device, operating system, and unique device identifiers.
	+ - 1. Purpose of Processing
* Maintain the security and operation of our App;
* Improve your user experience; and
* Internal analytics purposes.
	+ - 1. Legal Basis

Please note that we only use cookies with your consent except for strictly necessary cookies that do not require your consent (ePrivacy Directive 2002/58 EC).

* + - 1. Retention Period

We only keep this data until such time that you withdraw your consent. You can decline cookies from the App by clicking the decline button in the cookie banner on the App or changing your browser settings to decline all third-party cookies.

# Disclosure of Personal Data

We respect your Personal Data, and we do not engage in the practice of selling or renting your Personal Data. We only disclose/share our users’ Personal Data as described hereunder:

* 1. Sharing data between Users
		1. When you place an Order with a Store, we make some of your Personal Data available to the Store to enable the Store to process your Order, such as your phone number and shipping address (if applicable); and
		2. If you send messages to a Seller through the App to arrange a viewing of a Product listed by a Seller, your public profile and the content of your message will be made available to the Seller.
	2. Third-Party Service Providers

We may share and disclose your Personal Data with third-party service providers that we engage during the performance of our business operations, such as web hosting, email distribution, marketing, and customer support services. For the avoidance of any doubt, we will only disclose your Personal Data that is necessary for our Service Providers to perform their functions on our behalf. Our Service Providers will only use your Personal Data as authorised by us. In no event will our Service Providers be allowed to use your Personal Data for any purpose other than those specified in this Privacy Policy.

* 1. Change of Ownership

If, in the future, we buy a business or are acquired by another business, our users’ Personal Data may be disclosed to the new entity as part of due diligence and transferred as part of the commercial transaction. We assure you that in the event of any such changes in ownership, your Personal Data will continue to be governed by this Privacy Policy, except in cases where you expressly consent otherwise.

* 1. To protect our rights

We may disclose your Personal Data to a relevant third party to:

* enforce our Agreement with you;
* defend ourselves in legal actions against you; or
* protect our users or others from threats posed by your actions.
	1. Lawful requests

If we receive a lawful request for your Personal Data from any law enforcement authorities or courts of law with jurisdiction over the Company, we will only disclose your Personal Data where we are legally obliged to provide it.

Your Personal Data may be transferred and processed outside of your country of residence. If your Personal Data is transferred and processed in a jurisdiction that is not deemed adequate by the European Commission, we will only transfer your Personal Data pursuant to appropriate Standard Contractual Clauses as required by the GDPR.

# Storage and Security of Personal Data

Your Personal Data will be stored in the Republic of India and other parts of the world in accordance with this Privacy Policy.

Our App is designed with the security of data in mind. We collect limited Personal Data, which reduces the risk and impact of data breaches on our users. We have also implemented appropriate organisational and technical security protocols to prevent any unauthorised access or deletion of your Personal Data. We use encryption protocols, firewalls, and periodic data audits to ensure the security of the Personal Data we process. We also restrict access to data within our Company on a need-to-know basis to prevent unauthorised access to any Personal Data. All user accounts are password-protected. We have also adopted data security policies in line with the industry’s best practices.

Despite all our efforts to ensure the security of your Personal Data, you acknowledge that data transmission over the internet is never one hundred percent secure. Thus, we cannot offer any guarantees regarding the absolute security of your Personal Data. You acknowledge that the transmission of your Personal Data during the use of our App is at your own risk.

# Your Rights

You have the following rights as a data subject:

* 1. Right to access your Personal Data that we process

You have the right to request access to your Personal Data or a copy of your Personal Data by contacting us.

* 1. Right to rectification of any incorrect or incomplete Personal Data

If the Personal Data we process for you is incorrect, outdated or incomplete, you may request us to rectify, update or complete your missing Personal Data by contacting us.

* 1. Right to object to the processing of your Personal Data

In certain circumstances, you may have the right to object to our processing of your Personal Data or request that we restrict processing your Personal Data by contacting us.

* 1. Right to request deletion of your Personal Data

You may request the deletion of your account and associated Personal Data by contacting us. You understand that even after the deletion of your account on the App, we may be required to retain some of your Personal Data on other lawful grounds, including compliance with our legal obligations.

* 1. Right to withdraw your consent

To the extent the legal basis of our processing of your Personal Data is your consent, you have the right to withdraw your consent at any time. You can opt out of receiving marketing communication from us by clicking the ‘unsubscribe’ link at the bottom of our marketing emails. You can also block the use of our cookies to which you previously consented by accessing your browser settings.

* 1. Right to complain to the local supervisory authority

If you believe that our processing of your Personal Data violates any of your privacy rights, you may also file a complaint against such infringement with your local supervisory authority.

# California Residents

If you are a California resident and we share your Personal Data with third parties for such third party’s own marketing purposes, in accordance with the California Shine the Light disclosure, you may contact us and request the name of such third parties and the categories of Personal Data we have shared with them once a year by contacting us. Please note that you will be required to provide us with proof that you are a California resident.

California Online Privacy Protection Act (“CalOPPA”) requires us to inform our users how we respond to Do Not Track (“DNT”) signals. We currently do not respond to DNT signals.

# Children’s Privacy

We are committed to protecting children’s privacy. We do not allow minors to sign up for an account and submit any Personal Data. If you have information that a child has provided his/her Personal Data to us, please contact us, and we will investigate the matter and take appropriate action to remove such information.

# Updates

From time to time, we may amend this Privacy Policy to reflect our new privacy practices and commitment to compliance with applicable privacy laws and regulations. We will post the updated Privacy Policy on this page and notify you of such updates by changing the last updated date on the top or by sending you an email. You should review this Privacy Policy regularly to ensure that you are familiar with any changes. You understand and accept that your continued use of the App after the amendments are published will be deemed your tacit acceptance of any updated privacy practices.

# Third-Party Websites

The App may contain links to third-party sites that are not owned or operated by us. Should you decide to click on any such third-party links, you will be directed to such a third-party’s website. These third-party websites are governed by their own Terms and Conditions and Privacy Policy. We encourage our users to review the third-party Terms and Privacy Policy before using their services. The presence of any third-party links on our App does not constitute an endorsement or recommendation of such a third party, and we cannot be held responsible for such a third party’s actions.

# Contact us

You can contact us at:

Watugot Mobile Applications LLP

Building No. 5/2224,

Vaishnavi Kasaba,

Ashokapuram PO Calicut Kerala 673001

India

Email: info@watugot.net