

TON Studio - General Privacy Policy

Preamble

This Privacy Policy (“**Privacy Policy**”) and our Terms of Use (“**Terms**”) explain and set out the basis for our collection of personal information about the people who use the products (“**Product**”) or services (“**Service**”) or visit the website at <https://tonstudio.io> (“**Website**”), when You interact with us in relation to a contract, communicate with us or otherwise deal with us, how we use it, the conditions under which we may disclose it to others and the measures we take to keep it secure.

When We use the term “Personal Information” in this Privacy Policy, We mean all information making You directly or indirectly identifiable (e.g. Your name, first name, address, phone number or email address but also the IP address of your computer, for example, or the information relating to your use of our Service).

We comply with the Data Protection Laws of the United Arab Emirates and, to the extent applicable, the data protection laws of other jurisdictions, including but not limited to, the European General Data Protection Regulation (hereinafter the “GDPR”) and that We process Your data lawfully, fairly and transparently.

1. Who we are

TON Studio - FZCO (“**We**” or “**Us**” or “**Our**”), is a company incorporated in The United Arab Emirates. The registered address at PO Box 342001, IFZA Business Park, Dubai Digital Park, Dubai, United Arab Emirates. We are the controller of personal information we process under this Privacy Policy. If You have any questions about Our privacy practices or this Privacy Policy, or to exercise Your rights as detailed in this Privacy Policy, please contact us at legal@tonstudio.io

2. Information We collect from You

We collect information about You use Our Products, Services or Website, and when you contact us via email or a web form or if you register to receive one of our regular newsletters.

The information collected may be used to provide and improve the functionality of Our Products, Services and Website, including but not limited to:

- Your name, personal information, email address and the contact details.
- Your Telegram account data, such as your username, Telegram ID, and publicly displayed name, which are automatically shared with Us when You use the Telegram mini-app.
- Blockchain wallet information, such as Your wallet address, to enable features that interact with blockchain systems.
- Basic technical data, including Your IP address, approximate location, device type, operating system, and browser, to ensure the security and proper operation of Our Services.

By providing Us with this information, You expressly consent to Our use of Your personal information in accordance with this Privacy Policy.

3. Information We receive from other sources

We may receive information about You if You use any other services that are operated by Us or Our partners. We also work with third parties (including but not limited to, contractors, project partners, service providers, analytics providers) and may receive information about You from them. This may be combined with other information You provide to Us.

4. How Your information is used

We may use personal information about You for the following purposes:

- to ensure the proper functioning of Our Products, Services or Website to You, including maintaining, supporting, and improving its features and performance.
- to provide You with relevant information and news.
- to send You personalised communications which You have requested and that may be of interest to You, which may be based on Your activity and usage on our Products, Services or Website or those provided by Our partners. These may include information about campaigns, activities and events.
- to understand and measure the effectiveness of how We serve You and others and to make suggestions and recommendations to You about the Products, Services or Website or other services that may interest You, which may be based on Your activity and usage on Our Products, Services or Website or other services of Us or Our partners.
- for analytics and profiling to create aggregate trend reports, find out how users access to and use Our Products, Services or Website, the responses to marketing campaigns and to determine the most effective marketing channels and messages
- to seek Your views or comments on the Products, Services or Website We provide.
- to notify You of changes to Our Products, Services or Website, policies and Terms of Use.

We review Our retention periods for personal information on a regular basis. We will hold Your personal information on Our systems for as long as is necessary for the relevant activity, or for complying with legal retention requirements or where required to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. Upon expiry of the applicable retention period, We will securely destroy Your data in accordance with applicable laws and regulations.

5. Who has access to Your information

We will not sell your information to third parties. In certain cases, We may share Your information with trusted third-party service providers, agents, subcontractors, or affiliated organisations to perform specific tasks and deliver services to You, such as processing and storing information or sending communications.

6. Your choices and Your rights

Please note that some of the rights mentioned below may apply to You although may be subject to limitations in some situations, and that the exercise of these rights may affect, restrain or render impossible our ability to continue a business relationship with You.

- Right to confirmation

You have the right to obtain confirmation from Us as to whether or not personal information concerning You is being processed. If You wish to avail yourself of this right of confirmation, You may, at any time, contact Us as stated in section 1 of this Privacy Policy.

- Right to access

You have the right to obtain free information from Us about your personal information stored at any time, and a copy of this information. Furthermore, You will have access to the following information:

- (a) the purposes of the processing;
- (b) the categories of personal information concerned;
- (c) the recipients or categories of recipients to whom the personal information has been or will be disclosed, in particular recipients in third countries;
- (d) where possible, the envisaged period for which the personal information will be stored, or, if not possible, the criteria used to determine that period;
- (e) the existence of the right to request from Us rectification or erasure of personal information, or the restriction of the processing of personal information concerning you, or to object to such processing;
- (f) the existence of the right to lodge a complaint with a supervisory authority;
- (g) where the personal information is not collected directly from you, any available information as to their source; and
- (h) the existence of automated decision-making, including profiling, as referred to in the GDPR, to the extent applicable, and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for you.

If You wish to avail yourself of this right of access, You may at any time contact us as stated in section 1 of this Privacy Policy.

- Right to rectification

You have the right to obtain from Us, without undue delay, the rectification of inaccurate personal information concerning you. Taking into account the purposes of the processing, You shall have the right to have incomplete personal information completed, including by means of providing a supplementary statement.

If You wish to exercise this right to rectification, You may, at any time, contact us as stated in section 1 of this Privacy Policy.

- Right to erasure (right to be forgotten)

You have the right to request from Us the erasure of personal information concerning You as soon as possible, and Us shall have the obligation to erase personal information without undue delay where one of the following grounds applies:

- (a) The personal information is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- (b) You withdraw consent to which the processing is based according to applicable law and where there is no other legal ground for the processing;
- (c) The data subject objects to the processing pursuant to applicable law and there are no overriding legitimate grounds for the processing;

- (d) The personal information has been unlawfully processed;
- (e) The personal information must be erased for compliance with a legal obligation, in accordance with the applicable law; and/or
- (f) The personal information has been collected in relation to the offer of information society services referred to in the GDPR, to the extent applicable.

If any one of the aforementioned reasons applies, and You wish to request the erasure of personal information stored by Us, You may at any time contact us as stated in section 1 of this Privacy Policy. We shall promptly ensure that the erasure request is complied with as soon as possible.

- Right to restriction of processing

You have the right to obtain the restriction of processing from Us where one of the following applies:

- (a) The accuracy of the personal information is contested by you, for a period enabling Us to verify the accuracy of the personal information;
- (b) The processing is unlawful and You oppose the erasure of the personal information and request instead the restriction of their use;
- (c) We no longer need the personal information for the purposes of the processing, but they are required by You for the establishment, exercise or defense of legal claims; and/or
- (d) The data subject has objected to applicable law, pending the verification whether Our legitimate grounds override those of the data subject.

If any one of the aforementioned conditions is met, and You wish to request the restriction of the processing of personal information stored by Us, You may at any time contact us. We will arrange the restriction of the processing.

- Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to the processing of personal information concerning you, which is based on point (e) or (f) of Article 6(1) of the GDPR, to the extent applicable. This also applies to profiling based on these provisions.

We shall no longer process the personal information in the event of the objection, unless We can demonstrate reasonable grounds for the processing, which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims. In order to exercise the right to object, You must contact us.

- Right to data portability

You have the right to receive the personal information concerning you, which was provided to Us, in a structured, commonly used and machine-readable format. You shall have the right to transmit those data to another controller without hindrance from Us to which the personal information has been provided, as long as the processing is based on consent, pursuant to article 6 (1) GDPR or point (a) of article 9 (2) GDPR, or on a contract pursuant to point (b) of article 6 (1) GDPR, to the extent that such provisions of the GDPR are applicable, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest.

Furthermore, in exercising your right to data portability pursuant to article 20 (1) GDPR, to the extent applicable, You shall have the right to have personal information transmitted directly from one controller to another, where technically feasible and when doing so does

not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, You may at any time contact us.

- Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between You and Us, or (2) is not authorized by the applicable law and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or (3) is not based on your explicit consent.

Due to legal and regulatory requirements, we are required to combat money laundering, terrorism financing, fraud and assess risks and offences that pose a danger to assets. Automated data assessments are also carried out for this purpose. At the same time, these measures also serve to protect you.

Furthermore, we use assessment tools in order to be able to specifically notify You and advise You about our products. These allow communications and marketing to be tailored as needed, including market and opinion research.

If the decision (1) is necessary for entering into, or the performance of, a contract between You and Us, or (2) it is based on your explicit consent, We shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and contest the decision.

If You wish to exercise the rights concerning automated individual decision-making, You may, at any time, contact us.

Please note that We do not currently use automatic decision-making but we may use profiling according to these Privacy Policy rules or implement automatic decision-making at a later time.

- Right to withdraw data protection consent

You have the right to withdraw your consent to processing of your personal information at any time. If You wish to exercise the right to withdraw the consent, You may at any time contact us.

- Manifestly unfounded or excessive use of rights

While the exercise of any individual rights mentioned above will be free of charge, a reasonable fee may be exceptionally charged if such requests are manifestly unfounded or excessive. We may refuse to comply with the request under such circumstances.

You also have the right to inform Us not to process Your personal information for marketing purposes. You can exercise Your right and prevent Us from processing such information by checking or unchecking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting us at legal@tonstudio.io

We will not contact You for marketing purposes unless You have given your prior consent. You can change your marketing preferences at any time by contacting us at <http://t.me/>

7. How You can update Your information

The accuracy of Your information is important to Us. If You change any of the other information We hold is inaccurate or out of date, please contact Us by at legal@tonstudio.io

8. Security measures to protect Your information

When You give Us personal information, We take steps to ensure that it's treated securely. Personal information security is of great importance to the Company. In order to protect Your personal information, We have implemented appropriate physical, electronic and organizational procedures to safeguard and secure the personal information collected via Our Website in order to ensure its integrity and confidentiality. Our security measures are continuously being improved in line with technical developments.

Non-sensitive details may be transmitted unencrypted over the Internet, and so may not be guaranteed to be 100% secure. While We strive to protect Your personal information, We cannot guarantee the security of any information You transmit to Us, and You do so at Your own risk. When We receive Your information, We make our best effort to ensure its security on Our systems.

9. Profiling

We may analyse Your personal information to create a profile of Your preferences and interests so that We can contact You with information relevant to You. We may make use of additional information about You when it is available from external sources to help Us do this effectively.

10. Use of Cookies

Our Service use cookies to distinguish You from other users of Our Service. Cookies are small text files that may be stored on Your computer (or other internet enabled devices, such as a smartphone or tablet). They are sent by a server to Your computer and stored on Your hard drive to allow a website to recognise You when You access.

Cookies can be used by websites to make the user's experience more efficient. Our Service use different types of cookies. Some cookies are placed by third party services that appear on Our pages. We use cookies to personalise content, to provide social media features and to analyse Our traffic. This improves Your experience when You access to Our Products, Services and Website and allows Us to improve the Products, Services and Website We provide. By continuing to use Our Products, Services and Website, You are agreeing to Our use of cookies.

We also share information about Your use of Our Products, Services and Website with Our social media and analytics partners who may combine it with other information that You have provided to them or that they have collected from Your use of their services.

We use the following cookies:

- **Strictly Necessary Cookies**

These cookies are necessary for the Products, Services and Website to function and cannot be switched off in Our systems. They are usually only set in response to actions made by You which amount to a request for services, such as setting Your privacy preferences, logging in or filling in forms. These cookies enable basic functions like page navigation and access to secure areas of the Products, Services and Website. The Products, Services and Website may not function properly without these cookies.

11. Links to other websites or Apps or Mini Apps

Our Products, Services and Website may contain links to other websites, Apps or Mini Apps run by other organisations. This Privacy Policy applies only to Our Products, Services and Website, so We encourage You to read the privacy statements on the other websites, Apps or Mini Apps You access and use. We cannot be responsible for the privacy policies and practices of other websites, Apps or Mini Apps even if You access or use them using links from Our Products, Services and Website.

If you link to our Products, Services and Website from a third party website, Apps or Mini Apps, We cannot be responsible for the privacy policies and practices of the owners and operators of that third party website Apps or Mini Apps, and recommend that You check the policy of that website.

12. If You are 18 or under

We are concerned to protect the privacy of children. If You are aged under 18, please get Your parent/guardian's permission beforehand whenever You provide us with personal information or use our Service.

13. Where We store Your personal information

The data that we collect from You may be transferred to, and stored in, a country outside the United Arab Emirates. It may also be processed by staff operating outside the United Arab Emirates who work for Us. The laws in some countries may not provide the same legal protection for your information as in the United Arab Emirates. We only transfer data to these countries when it is necessary for the performance of a contract or for the exercise or defence of legal claims, or if such transfer is based on Your explicit consent or subject to safeguards that assure the protection of Your data, such as the United Arab Emirates approved standard contractual clauses.

The transmission of information via the internet is not completely secure. Although We will always do Our best to protect Your personal information, We cannot guarantee the security of Your information; any transmission is at Your own risk. Once We have received Your information, We will use good procedures and strong security features to try to prevent unauthorised access.

14. Miscellaneous

If a court or competent authority considers that any provision of this Privacy Policy (or any part thereof) is invalid, illegal or unenforceable, that provision or relevant part of the provision will, to the extent required, be deemed to be deleted. The validity and enforceability of the other provisions of this Privacy Policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising a right or

remedy will be deemed a waiver of such right, or of another right or remedy.

All matters relating to this Privacy Policy and any dispute or claim arising therefrom or related thereto (in each case, including non-contractual disputes or claims), shall be governed by and construed in accordance with the laws of The United Arab Emirates without giving effect to any choice or conflict of law provision or rule (whether of The United Arab Emirates or any other jurisdiction).

Any legal suit, action or proceeding arising out of, or related to, this Privacy Policy shall be instituted exclusively in The United Arab Emirates, although we retain the right to bring any suit, action or proceeding against you for breach of this Privacy Policy and [Terms of Use](#) in your country of residence or any other relevant country. You waive any and all objections to the exercise of jurisdiction over you by such courts and to venue in such courts.

15. Updating and changing this Privacy Policy

Due to continuous development of Our Service and the contents thereof, changes in law or regulatory requirements, we might need to change this Privacy Policy from time to time.

Last Updated: 18.02.2025