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# Privacy Policy

*Release 0*

**GNU Taler team**

**Sep 07, 2021**



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This Privacy Policy describes the policies and procedures of Anastasis SARL (“we,” “our,” or “us”) pertaining to the collection, use, and disclosure of your information on our sites and related mobile applications and products we offer (the “Services”). This Privacy Statement applies to your personal data when you use our Services, and does not apply to online websites or services that we do not own or control.



## OVERVIEW

Your privacy is important to us. We follow a few fundamental principles: We don't ask you for personally identifiable information (defined below). That being said, your contact information, such as your phone number, social media handle, or email address (depending on how you contact us), may be collected when you communicate with us, for example to report a bug or other error related to Anastasis. We don't share your information with third parties except when strictly required to deliver you our Services and products, or to comply with the law. If you have any questions or concerns about this policy, please reach out to us at [privacy@anastasis.lu](mailto:privacy@anastasis.lu).





## HOW YOU ACCEPT THIS POLICY

By using our Services or visiting our sites, you agree to the use, disclosure, and procedures outlined in this Privacy Policy.



## WHAT PERSONAL INFORMATION DO WE COLLECT FROM OUR USERS?

The information we collect from you falls into two categories: (i) personally identifiable information (i.e., data that could potentially identify you as an individual) (“Personal Information”), and (ii) non-personally identifiable information (i.e., information that cannot be used to identify who you are) (“Non-Personal Information”). This Privacy Policy covers both categories and will tell you how we might collect and use each type.

We do our best to not collect any Personal Information from Anastasis users. The detailed Personal Information Anastasis asks from you during the regular backup and recovery process at the beginning is never shared with us and only used to create a cryptographic account identifier which does not allow us to recover any of your details.

That being said, when using our Services to recover key material, we may inherently receive the following information (depending on your choice of authentication method):

- Bank account details necessary when receiving funds from you to authenticate via a SEPA transfer. We will store these as part of our business records for accounting, and our bank will also be legally obliged to store the details for many years.
- Your phone number when using SMS authentication. We rely on third party providers (such as your mobile network operator) to deliver the SMS to you. These third parties will see the SMS message sent to you and could thus learn that you are using Anastasis. SMS is inherently insecure, and you should expect many governments and private parties to be able to observe these messages. However, we do not store your SMS number on our systems, except maybe in short-term logs to diagnose errors.
- Your e-mail address when using E-mail authentication. We rely on the Internet and your E-mail provider to deliver the E-mail to you. Internet service providers will see the E-mail message sent to you and could thus learn that you are using Anastasis. E-mail is inherently insecure, and you should expect many governments and private parties to be able to observe these messages. However, we do not store your E-mail address on our systems, except maybe in short-term logs to diagnose errors.
- Your physical address when using postal mail authentication. We rely on external providers for printing and sending the letter to you. These providers will need to learn your address and could learn that you are using Anastasis. Physical mail has strict privacy protections by law, but governments are known to break postal secrecy. We do not store your physical address on our systems, except maybe in short-term logs to diagnose errors.
- When you contact us. We may collect certain information if you choose to contact us, for example to report a bug or other error with the Taler Wallet. This may include contact information such as your name, email address or phone number depending on the method you choose to contact us.



## HOW WE COLLECT AND PROCESS INFORMATION

We may process your information for the following reasons:

- to authenticate you during secret recovery
- to support you using Anastasis when you contact us



## HOW WE SHARE AND USE THE INFORMATION WE GATHER

We may share your authentication data with other providers that assist us in performing the authentication. We will try to use providers that to the best of our knowledge respect your privacy and have good privacy practices. We reserve the right to change authentication providers at any time to ensure availability of our services.

We primarily use the limited information we receive directly from you to enhance Anastasis. Some ways we may use your Personal Information are to: Contact you when necessary to respond to your comments, answer your questions, or obtain additional information on issues related to bugs or errors with the Anastasis application that you reported.





## **AGENTS OR THIRD PARTY PARTNERS**

We may provide your Personal Information to our employees, contractors, agents, service providers, and designees (“Agents”) to enable them to perform certain services for us exclusively, including: improvement and maintenance of our software and Services. By accepting this Privacy Policy, as outlined above, you consent to any such transfer.



## PROTECTION OF US AND OTHERS

We reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with the law or a court order.



## WHAT PERSONAL INFORMATION CAN I ACCESS OR CHANGE?

You can request access to the information we have collected from you. You can do this by contacting us at [privacy@anastasis.lu](mailto:privacy@anastasis.lu). We will make sure to provide you with a copy of the data we process about you. To comply with your request, we may ask you to verify your identity. We will fulfill your request by sending your copy electronically. For any subsequent access request, we may charge you with an administrative fee. If you believe that the information we have collected is incorrect, you are welcome to contact us so we can update it and keep your data accurate. Any data that is no longer needed for purposes specified in the “How We Use the Information We Gather” section will be deleted after ninety (90) days.



## **DATA RETENTION**

Information entered into our bug tracker will be retained indefinitely and is typically made public. We will only use it to triage the problem. Beyond that, we do not retain personally identifiable information about our users for longer than one week.





## DATA SECURITY

We are committed to making sure your information is protected. We employ several physical and electronic safeguards to keep your information safe, including encrypted user passwords, two factor verification and authentication on passwords where possible, and securing connections with industry standard transport layer security. You are also welcome to contact us using GnuPG encrypted e-mail. Even with all these precautions, we cannot fully guarantee against the access, disclosure, alteration, or deletion of data through events, including but not limited to hardware or software failure or unauthorized use. Any information that you provide to us is done so entirely at your own risk.



## CHANGES AND UPDATES TO PRIVACY POLICY

We reserve the right to update and revise this privacy policy at any time. We occasionally review this Privacy Policy to make sure it complies with applicable laws and conforms to changes in our business. We may need to update this Privacy Policy, and we reserve the right to do so at any time. If we do revise this Privacy Policy, we will update the “Effective Date” at the top of this page so that you can tell if it has changed since your last visit. As we generally do not collect contact information and also do not track your visits, we will not be able to notify you directly. However, Anastasis clients may inform you about a change in the privacy policy once they detect that the policy has changed. Please review this Privacy Policy regularly to ensure that you are aware of its terms. Any use of our Services after an amendment to our Privacy Policy constitutes your acceptance to the revised or amended agreement.



## INTERNATIONAL USERS AND VISITORS

Our Services are (currently) hosted in Germany. If you are a user accessing the Services from the Switzerland, Asia, US, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from the laws of Germany, please be advised that through your continued use of the Services, which is governed by the law of the country hosting the service, you are transferring your Personal Information to Germany and you consent to that transfer.



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CHAPTER  
**THIRTEEN**

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**QUESTIONS**

Please contact us at [privacy@anastasis.lu](mailto:privacy@anastasis.lu) if you have questions about our privacy practices that are not addressed in this Privacy Statement.