
Privacy Policy

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UNCOD3 PTE. LTD.

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This Privacy Policy explains how UNCOD3 PTE. LTD. ("**UNCOD3**," "**we**," "**us**," or "**our**") collects, uses, discloses, and protects your personal data when you access or use the Activate platform, including our Telegram mini app, website, and related services (collectively, the "**Platform**").

The Platform operates as a Telegram Mini App (Third-Party App or "TPA" under Telegram's terms). This Privacy Policy is provided in accordance with Telegram's Terms of Service for Mini Apps and the Telegram Bot Platform Developer Terms of Service, and supersedes Telegram's Standard Bot Privacy Policy with respect to data processing activities specific to the Platform.

This Privacy Policy also complies with the Singapore Personal Data Protection Act 2012 ("**PDPA**"), the General Data Protection Regulation ("**GDPR**") where applicable to users in the European Economic Area, and all other applicable data protection laws.

By using the Platform, you agree to the collection and use of your information in accordance with this Privacy Policy.

1. Information We Collect

1.1 Information You Provide

Data Type	Examples	Purpose
Telegram Account Data	Telegram user ID, display name, username, profile photo URL, language code	Account creation, authentication, in-app identification
Contact Information	Email address	Account communications, notifications, support
Social Media Accounts	X (Twitter) handle, TikTok username, YouTube channel	Campaign eligibility, content verification, audience analytics
Blockchain Wallet Address	TON wallet address	Payment processing, reward distribution, transaction verification
Profile & Content Data	Bio, interests, content submissions, campaign responses	Matching with campaigns, platform personalization

1.2 Information Collected Automatically

- **Device & Usage Data:** IP address, browser type, device type, operating system, pages viewed, access times, referring URLs, and interaction patterns within the Platform.
- **Telegram Mini App Data:** Data provided via the Telegram mini app environment, including initialization parameters and session identifiers, validated using Telegram's cryptographic verification.
- **Blockchain Transaction Data:** On-chain transaction hashes, wallet balances relevant to Platform transactions, and smart contract interaction records on the TON blockchain.

1.3 Information from Third Parties

When you connect your social media accounts, we may receive publicly available profile information, follower counts, engagement metrics, and content performance data from X (Twitter), TikTok, and YouTube through their respective APIs, subject to the permissions you grant.

1.4 Data Minimization

We only collect personal data that is necessary for the Platform's designated features and services. We do not create large datasets, machine learning models, or AI products from user data, nor do we engage in data scraping or aggregation beyond the Platform's core functionality.

2. How We Use Your Information

We use the information we collect for the following purposes:

- To create, maintain, and secure your account on the Platform.
- To facilitate influencer marketing campaigns, including matching creators with brands.
- To process payments and distribute rewards via the TON blockchain, Telegram Stars, and traditional payment methods.
- To verify your identity and social media account ownership.
- To analyze content performance and provide campaign analytics to brands and creators.
- To communicate with you regarding your account, campaigns, updates, and support requests.
- To improve, personalize, and optimize the Platform experience.
- To detect, prevent, and address fraud, abuse, security incidents, and technical issues.
- To comply with applicable laws, regulations, and legal processes.

We do not use personal data received through Telegram for purposes unrelated to the Platform's core functionality, and we do not monetize or sell user data.

3. Legal Basis for Processing

We process your personal data on the following legal bases:

- **Consent (PDPA & GDPR):** Where you have given express or implied consent, such as by voluntarily providing your data or connecting third-party social media accounts. You may withdraw consent at any time (see Section 10).
- **Contractual Necessity (GDPR):** Processing necessary to perform our contract with you.
- **Legitimate Interests (GDPR):** Processing necessary for our legitimate business interests, including fraud prevention, platform security, and service improvement.
- **Legal Obligation:** Processing necessary to comply with applicable legal or regulatory requirements, including PDPA, GDPR, and anti-money laundering regulations.

4. How We Share Your Information

We do not sell your personal data. We may share your information in the following circumstances:

- **With Brands & Campaign Partners:** When you participate in campaigns, relevant profile information may be shared with the brand or advertiser running the campaign.
- **Service Providers:** We engage trusted third-party service providers who process data on our behalf, subject to contractual obligations of confidentiality and data protection.
- **Blockchain Networks:** Transaction data submitted to the TON blockchain is publicly visible by the nature of distributed ledger technology.
- **Legal Requirements:** We may disclose information if required by law, regulation, or government request.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your information may be transferred as part of that transaction.

We do not share Telegram user data with third parties except as described above and as permitted by Telegram's terms.

5. Telegram Platform Data

5.1 Data Received from Telegram

When you launch the Platform through Telegram, we receive data including your Telegram user ID, first name, last name (if provided), username, language code, and profile photo URL. This data is validated using Telegram's cryptographic verification to prevent tampering.

5.2 Telegram Bot Interactions

If you interact with our Telegram bot directly, we may receive your messages, commands, and any files or media you send. We process this data solely to provide the requested service and do not store message content beyond what is necessary for Platform functionality.

5.3 Compliance with Telegram Policies

Our data processing practices comply with the Telegram Terms of Service for Mini Apps, the Bot Platform Developer Terms of Service, and all applicable Telegram policies. Telegram does not vet or control our data practices; UNCOD3 is solely responsible for how we handle your data within the Platform.

5.4 TON Blockchain Compliance

In accordance with Telegram's blockchain guidelines, the Platform exclusively uses the TON Blockchain for all cryptocurrency and blockchain-related features, and interfaces with wallets connected via the TON Connect protocol.

6. Social Media API Data

6.1 X (Twitter) API

When you connect your X account, we access your public profile information and post engagement metrics through the X API. We do not use X data for surveillance, tracking, or monitoring purposes. Our use of X data is strictly limited to campaign-related purposes described in this Privacy Policy.

6.2 TikTok API

When you connect your TikTok account, we access your public profile data and video performance metrics through TikTok's API. Data is processed only for account verification, content tracking, and engagement analytics, and is retained only as long as necessary.

6.3 YouTube API

When you connect your YouTube channel, we access your public channel data and video metrics through the YouTube API Services. By using features that access YouTube data, you agree to be bound by the YouTube Terms of Service. You can revoke the Platform's access to your YouTube data via Google's security settings.

7. Third-Party Services

The Platform integrates with and relies on the following third-party services:

Service	Purpose	Data Shared
Amazon Web Services (AWS)	Cloud infrastructure, hosting, data storage	All Platform data (encrypted at rest and in transit)
TON Blockchain	Payment processing, reward distribution	Wallet addresses, transaction amounts, smart contract interactions
X (Twitter) API	Account verification, content tracking, engagement analytics	OAuth tokens, public profile data, post metrics
TikTok API	Account verification, content tracking, engagement analytics	OAuth tokens, public profile data, video metrics
YouTube API Services	Account verification, content tracking, engagement analytics	OAuth tokens, public channel data, video metrics
Telegram Bot API	Mini app delivery, user authentication, notifications	Telegram user ID, username, interaction data

8. Data Retention

We retain your personal data for as long as your account is active or as needed to provide Platform services. Specific retention periods:

- **Account Data:** Retained for the duration of your account and for up to 12 months after account deletion, unless longer retention is required by law.
- **Campaign & Transaction Data:** Retained for a minimum of 5 years after the relevant transaction or campaign completion, as required for financial record-keeping, tax compliance, and dispute resolution.
- **Social Media API Data:** Retained only as long as necessary for campaign purposes. YouTube API data is deleted within 30 days of the purpose being fulfilled or upon revocation of access.
- **Usage & Analytics Data:** Retained in anonymized or aggregated form for up to 24 months for service improvement purposes.
- **Blockchain Data:** On-chain transaction data is immutable and permanently recorded on the TON blockchain. We cannot delete or modify on-chain records.

9. Data Security

We implement industry-standard technical and organizational measures to protect your personal data, including:

- Encryption of data in transit using TLS 1.2 or higher (HTTPS).
- Encryption of data at rest using AES-256 or equivalent.
- Access controls and authentication requirements for internal systems.
- Regular security assessments and monitoring.
- Secure cloud infrastructure through AWS with data residency controls.

While we take reasonable precautions to safeguard your data, no method of electronic transmission or storage is entirely secure. We cannot guarantee absolute security.

10. Your Rights

Depending on your jurisdiction, you have the following rights regarding your personal data:

- **Access:** Request a copy of the personal data we hold about you.
- **Rectification / Correction:** Request correction of inaccurate or incomplete data.
- **Erasure / Deletion:** Request deletion of your personal data, subject to legal retention requirements and blockchain immutability.
- **Restriction:** Request that we limit the processing of your data in certain circumstances.
- **Data Portability:** Request a machine-readable copy of your data (GDPR).
- **Withdrawal of Consent:** You may withdraw consent at any time by contacting us or disconnecting your accounts through the Platform.
- **Objection:** Object to processing based on legitimate interests (GDPR).
- **Complaint to Authority:** Lodge a complaint with the Personal Data Protection Commission (PDPC) in Singapore, or with the relevant data protection supervisory authority in your jurisdiction.

To exercise any of these rights, contact our Data Protection Officer at dpo@uncod3.xyz. We will respond within 30 days.

11. Data Breach Notification

In the event of a notifiable data breach, we will:

- Notify the Personal Data Protection Commission (PDPC) in Singapore as soon as practicable, and no later than 3 calendar days after determining the breach is notifiable, in accordance with the PDPA.
- Notify affected individuals as soon as practicable after notifying the PDPC.
- Where applicable, notify the relevant supervisory authority under GDPR within 72 hours of becoming aware of the breach.

12. International Data Transfers

Your data may be transferred to and processed in countries outside of your country of residence, including Singapore and locations where our cloud infrastructure (AWS) operates. Where such transfers occur, we ensure appropriate safeguards are in place, including standard contractual clauses, adequacy decisions, or other legally recognized transfer mechanisms.

13. Children's Privacy

The Platform is not directed to individuals under the age of 18. We do not knowingly collect personal data from children. If we become aware that we have inadvertently collected data from a child under 18, we will take reasonable steps to delete such data promptly. Contact us at dpo@uncod3.xyz if you believe a child has provided us with personal data.

14. Cookies and Tracking Technologies

The Platform may use cookies, local storage, and similar technologies to maintain session state, remember preferences, and analyze usage patterns. Within the Telegram mini app environment, tracking is limited to what is technically necessary for Platform functionality. You may control cookies through your browser settings, although disabling them may affect certain features.

15. Do Not Call Registry (Singapore)

If we send marketing communications to Singapore telephone numbers, we comply with the Do Not Call (DNC) provisions of the PDPA. We check the DNC Registry before sending marketing messages and honor all registered preferences. You may opt out of marketing communications at any time.

16. Data Protection Officer

In accordance with the PDPA, UNCOD3 has designated a Data Protection Officer ("**DPO**") responsible for ensuring compliance with applicable data protection laws. To contact our DPO:

Data Protection Officer — UNCOD3 PTE. LTD.

20A Tanjong Pagar Road, Singapore 088443

Email: dpo@uncod3.xyz

17. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. If we make material changes, we will notify you through the Platform or via the email address associated with your account. Your continued use of the Platform after any changes constitutes acceptance of the updated policy.

18. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

UNCOD3 PTE. LTD.

20A Tanjong Pagar Road, Singapore 088443

Email: privacy@uncod3.xyz • Data Protection Officer: dpo@uncod3.xyz • Website: uncod3.xyz