

Privacy Policy

1.1 Introduction

Welcome to Ask Gina (“we,” “us,” or “our”). We operate a platform that allows users (“you” or “your”) to interact with an AI agent (“Gina”) to discover and execute blockchain-based transactions. This Privacy Policy explains how we collect, use, store, and protect your personal information when you use our services (the “Services”). By using or accessing our website or Services, you agree to the terms of this Privacy Policy.

1.2 Data We Collect

1. **Account Information:** If you create an account or otherwise interact with our Services, we may collect information such as your name, email address, and wallet address.
2. **User Conversations:** We store user conversations with Gina to improve our Services, provide support, and enhance user experience.
3. **Technical Data:** We collect technical information (e.g., IP address, device information, browser type, operating system) for analytics and security purposes.
4. **Cookies and Similar Technologies:** We may use cookies or similar tracking technologies to enhance your experience, analyze usage, and provide you with tailored content.

1.3 How We Use Your Information

1. **Service Provision:** To operate and maintain our Services, allow you to interact with Gina, and facilitate on-chain transactions.
2. **Service Improvements:** To understand how our Services are used, troubleshoot technical issues, and develop new features.
3. **Communication:** To send administrative information such as updates, security alerts, and support messages.
4. **Legal and Compliance:** To comply with applicable laws, regulations, and legal obligations (including AML, sanctions, and other financial compliance requirements).

1.4 Lawful Basis for Processing (UK GDPR Compliance)

- **Consent:** Where you have provided explicit consent (e.g., subscribing to our mailing lists or consenting to optional data-sharing).
- **Contract:** Where data processing is necessary to perform our agreement with you (e.g., providing you with the Services).
- **Legal Obligation:** Where processing is necessary to comply with our legal obligations (e.g., KYC/AML checks, sanctions screening).
- **Legitimate Interests:** Where we use data to enhance and secure our Services while not overriding your fundamental rights and freedoms.

1.5 Data Sharing and Transfers

We do **not** sell or rent your personal data to third parties. We may share data with:

1. **Service Providers:** Trusted third parties who help us provide core parts of our Services (e.g., cloud hosting, analytics). These providers are subject to contractual obligations consistent with this Privacy Policy.
2. **Legal or Regulatory Authorities:** If required by law or in response to valid requests (e.g., court orders, government agencies).

1.6 International Data Transfers

If we transfer personal data outside the UK or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place (e.g., Standard Contractual Clauses) to protect your data in accordance with UK/EU data protection laws.

1.7 Data Retention

We keep your personal data only for as long as necessary to fulfill the purposes for which it was collected, including compliance with legal, accounting, or reporting requirements. User conversations may be retained for service improvements and troubleshooting but will be stored securely and subject to routine reviews to determine whether ongoing retention is necessary.

1.8 Security

We use industry-standard technical and organizational measures to protect your personal data against unauthorized access, loss, or misuse. However, no method of data transmission or storage is fully secure, and we cannot guarantee absolute security.

1.9 Your Rights

Subject to certain limitations under applicable law, you may have the right to:

- **Access:** Request access to the personal data we hold about you.
- **Rectify:** Have inaccurate data corrected or updated.
- **Erase:** Request the deletion of your personal data, subject to our legal obligations.
- **Restrict:** Restrict or object to certain types of processing.
- **Portability:** Receive your personal data in a machine-readable format (where feasible).
- **Withdraw Consent:** Where we rely on your consent to process your data, you can withdraw it at any time.

You can exercise these rights by contacting us at info@tybb.io

1.10 Updates to this Privacy Policy

We may update this Privacy Policy from time to time. Changes will be effective when posted on our website. We encourage you to review this page periodically to stay informed about how we protect your data.

1.11 Contact Us

If you have any questions or concerns regarding this Privacy Policy or our data practices, please contact us at info@tybb.io