

KoalaSwap Privacy Notice

Last Updated: June 10, 2025

Version: 1.0

1. This Privacy Notice

Please carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with your access to and use of the Platform. This Privacy Notice explains which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on. We handle your data in line with this Privacy Notice and strive to comply with applicable data protection laws.

2. Interpretation

Unless otherwise provided in this Privacy Notice, capitalised terms used in this Privacy Notice have the meaning determined in the [KoalaSwap Terms of Service](#) (the “**Terms**”). You should read the Terms carefully as they affect your obligations and legal rights. In this Privacy Notice, “personal data” and “personal information” are synonyms. They refer to any information that identifies or can reasonably identify you, either directly or indirectly.

3. Contact Details

We, Units Network Limited, a company established under the laws of the British Virgin Islands, are the data controller for the data collected under this Privacy Notice, meaning we determine how and why your data is processed. If you have any questions about this Privacy Notice or your data processing, please contact us at: support@units.network.

4. Type of Data

The categories of personal data collected depend on how you interact with us, use the Platform, and the requirements of the applicable laws. We collect and process the following types of personal data:

a. Wallet Data

This includes Wallet addresses, which are public blockchain addresses associated with your Wallet, and associated transaction data, which may include information about transaction ID, amount, status, time and date, etc. While a Wallet address alone does not identify a specific individual, when combined with other data (such as a name, nickname or email address), it may enable identification. As a result, such combined data could be considered personal information. However, since we do not process any additional information, your Wallet Data is typically not personally identifiable for us.

b. Platform Usage Data

This may include Internet protocol (IP) address, device details, operating system and browser information, data regarding your interactions with the Platform, and other data collected automatically via cookies or similar technologies.

c. Contact Data

This may include name, contact details (such as Telegram and Discord account handles), social media (such as X (Twitter), Telegram channel), and other data, depending on what information you provide to us. Please do not provide personal data unless it is reasonably necessary or requested by us. Note that we may also collect certain other information, which may be required under the applicable laws.

d. Communication Channels Data

When accessing or participating in our Communication Channels (e.g., X (Twitter), Telegram), you may provide personal data such as nicknames, names, photos, messages, comments, and other shared information. Additionally, the operators of the Communication Channels may automatically generate certain anonymised statistical and analytical data regarding the use of the Communication Channels.

Under applicable laws, we may act as a data controller or joint controller of this data. If we are deemed a joint controller, you may exercise your data protection rights with both us and the respective Communication Channel. However, we can only assist with processing operations explicitly covered in this Privacy Notice.

5. Data Use

The personal data is processed as follows:

a. Wallet Data

We use the Wallet Data (i) to ensure the Platform operation and enable you to use its functionality; (ii) for financial, accounting, and tax purposes; and (iii) to analyse Platform usage and improve its functionality, prevent and detect fraud or abuse, as well as safeguard the security of the Platform and its users.

The lawful basis for such data processing is (i) the performance of a contract with you; (ii) if you act on behalf of an entity, our legitimate interest to ensure the use of the Platform by the entity you represent; (ii) our legal obligation to comply with the applicable laws with respect to the financial, accounting, and tax purposes; and (iii) our legitimate interest in analysing usage, improving functionality, and ensuring the Platform's and its users' security.

b. Platform Usage Data

We use the Platform Usage Data (i) to operate the Platform, improve its functionality and user interface; (ii) to analyse your interactions with the Platform; (iii) to prevent and detect fraud or abuse; and (iv) to safeguard the security of the Platform and its users.

The lawful basis for data processing under item (i) is the performance of a contract. The lawful basis for other data processing is our legitimate interest to achieve such purposes.

c. Contact Data

To respond to your inquiry and, where applicable, discuss and perform potential collaboration requests.

The lawful basis for such data processing is our legitimate interest to respond to your inquiry, and, where relevant, taking steps to enter into a contract upon your request or the performance of such a contract.

d. Communication Channels Data

We use the Communication Channels Data (i) to communicate with visitors, participants, and subscribers; (ii) to handle requests and inquiries received via Communication Channels; and (iii) to gather statistical insights on audience reach and engagement.

The lawful basis for such data processing is our legitimate interest in achieving the stated purposes. If you intend to enter into a contract with us, the processing is also based on the necessity to take steps to enter into a contract upon your request or the performance of such a contract. However, beyond the data processing outlined in this Privacy Notice, we have no control over how Communication Channels handle your personal data in connection with your use of their services.

6. Processing Period

As a general rule, your personal data is kept as long as it is necessary for the purposes it was collected. It may be retained longer if required to meet our legal obligations, in relation to legal proceedings, or to protect our rights and legitimate interests or those of third parties. The storage periods are as follows:

a. Wallet Data

We do not set a retention period for Wallet Data that is not personal, and we are not able to identify any particular individual with such Wallet Data. If Wallet Data becomes identifiable, it will be retained for six (6) years after the completion of the transaction to which such data relates. Note that due to the nature of a blockchain, the Wallet Data may be stored permanently on the applicable blockchain, not by us, and may be accessed and viewed by any person at any time. For more details, refer to the [‘Your Information and Blockchain’](#) section of this Privacy Notice below.

b. Platform Usage Data

Technical Platform Usage Data, such as (IP) address, device details, operating system and browser information, is typically stored during the active user session or shortly after it ends. We do not set a retention period for the Platform Usage Data that does not allow us to identify any individual. If and to the extent we become able to identify any specific individual, we will update this Privacy Notice and set a specific processing period for this Platform Usage Data.

c. Contact Data

For six (6) years from the last date when you contacted us regarding the same matter.

d. Communication Channels Data

We do not set retention periods for statistical and analytical data, as it does not allow for the identification of any individual. Any other data is stored as long as they are not deleted by either you or the respective operator of the Communication Channel.

7. Data Sharing

a. General

We do not sell or rent out your data. We may share it in line with this Privacy Notice, applicable laws, the Terms, or with your consent. Appropriate measures will be taken to protect your data during such transfers.

b. Recipients

Given the purposes outlined above, your personal information is shared with the following categories of recipients: (i) Affiliates; (ii) support and technical teams; (iii) hosting service providers; (iv) government authorities, upon their request or if necessary to comply with our legal obligations; (v) another entity if we sell or otherwise transfer the Platform or its parts; and (vi) other third-party solutions, which may be from time to time integrated in relation to the Platform. Please note that data that was put into a blockchain will be accessible to any person.

8. Your Information and Blockchain

Please kindly note that the Wallet Data interacts with a decentralised blockchain network: essentially, you enter this data to the blockchain using your Wallet each time you make a blockchain transaction or interact with blockchain smart-contracts. We do not control nor operate blockchain networks. This means that due to the structure of the blockchain network, certain rights or abilities may be limited. It also means that your Wallet Data is publicly available to any person who has access to the blockchain. Please be aware that any transaction within the blockchain network is irreversible and information put into the blockchain cannot be deleted or changed. The ultimate decision whether to transact on a blockchain or carry out any transactions rests with you.

9. Automated Decision-Making

Automated decision-making is the process of making a decision by automated means without any human influence on the outcomes. We do not make any automated decisions based on your personal data. If we intend to process your personal data by any automated means, we will do our best to inform you about the same prior to such processing.

10. Data Subject Rights

a. Verification

In case you wish to exercise your data subject rights, we may request certain information from you to verify your identity and confirm that you are entitled to exercise such rights.

b. Blockchain Data Processing

Please note that when interacting with blockchain networks, you may not be able to fully exercise certain rights under applicable data protection laws regarding your Wallet Data. For example, we may be unable to delete, correct, or restrict your Wallet Data. For more details, refer to [‘Your Information and Blockchain’](#) section of this Privacy Notice.

c. Data Subject Rights.

According to the applicable legislation, you may have the following rights:

i. Right to Access

You can request to see if we process your personal data. If we do, you can ask for details about the processing and a copy of the data to verify its accuracy and legality.

ii. Right to Correction

You can request to correct or complete any incomplete or inaccurate data. We may need to verify the accuracy of the new information you provide.

iii. Right to Deletion

You can request the deletion of your personal data if we no longer need it, you have successfully objected to processing, we processed it unlawfully, or we must erase it to comply with the law. We may not always be able to fulfil your request due to legal or technical reasons, which will be explained in our response.

iv. Right to Objection

You can object to the processing of your data if it does not comply with applicable laws. We may, however, show that we have compelling legitimate grounds for processing that override your rights.

v. Right to Restrict Processing

You can ask us to suspend processing your data if: (i) you need to verify its accuracy, (ii) it is used unlawfully, but you do not want it deleted, (iii) you need it to establish, exercise, or defend legal claims, or (iv) you have objected to its use, and we need to verify if we have overriding grounds.

vi. Right to Data Portability

You can request your personal data be transferred to you or a third party in a structured, commonly used, machine-readable format. This right applies only to automated data processed based on your consent or performance of contract.

vii. Right to Withdraw Consent

You can withdraw your consent at any time if we are processing your data based on your consent.

viii. Right to Human Review

You can request a human review of decisions made solely based on automated processing, including profiling, if such decisions impact your rights.

ix. Right to File a Complaint

You can file a complaint with a supervisory authority if we violate your rights or legal obligations. The competent authority may depend on your location.

11. Third-Party Links

The Platform may include links and social media plugins to third-party websites and applications. Clicking on them may allow third parties to collect or share your data. We do not control or endorse these third parties and are not responsible for their privacy practices. You should review the privacy policies of any external websites or apps you visit.

12. Personal Data of Children

The Platform is not intended for children under 18 years (or older if local laws set a higher age). We do not knowingly collect or use personal data from children. If we learn that a child has provided us with personal information, it will be promptly deleted. Parents or guardians who believe their child's data has been collected should contact us.

13. Modifications and Updates

This Privacy Notice is under regular review, and may be updated at any time. If any changes to this document are made, we will change the "Last Updated" date and version number at the top of this Privacy Notice. Please review this Privacy Notice to check for the updates.