

Privacy Policy @November 18, 2025

Twist of Fate Limited (a Hong Kong company with registered office at RM 1505, 15/F., YU SUNG BOON BUILDING, 107-111 DES VOEUX RD CENTRAL, HONG KONG) operates the **Collector Crypt on TON** platform accessible via <https://collectorcrypt.tg> and the Telegram Mini-App at <https://t.me/CollectorCryptBot> (collectively, the "Service").

This Privacy Policy explains what personal information we collect, how we use and share it, and your rights and choices.

By using the Service, you agree to the collection, use, and disclosure of your information as described in this Privacy Policy. If you do not agree, please do not access or use the Service.

We may update this Privacy Policy from time to time. We will notify you of material changes by posting the updated policy on the Service and updating the "Effective Date". Your continued use after changes constitutes acceptance.

1. Personal Information We Collect

We collect the following categories of personal information:

Information you provide directly:

- Contact data (email address, shipping address for redemptions, phone number if provided)
- Profile data (Telegram username or display name if you connect via Telegram, wallet address)
- Communications (messages, support requests, feedback)
- Transactional data (purchase history, NFTs owned/minted/redeemed, raffle entries)
- Shipping & redemption data (full name, mailing address, customs information when redeeming physical cards)
- Any other information you voluntarily provide (e.g., in forms or messages)

Information collected automatically:

- Device data (IP address, browser type, operating system, device identifiers)
- Usage data (pages viewed, time spent, clicks, referral source)
- Approximate location data derived from IP address
- Cookies, pixels, and similar technologies for analytics, security, and functionality

Telegram Init Data (specific to our Telegram Mini-App):

When you launch the Service via Telegram, Telegram securely provides us with authenticated "Init Data" containing:

- Your Telegram user ID (unique numeric identifier)
- First name and (if provided) last name
- Username (if set)
- Language code
- Whether you have Telegram Premium
- Profile photo URL (if set)
- Other contextual fields (e.g., chat instance, start param if launched with)

This data is cryptographically signed by Telegram and verified server-side by us. We only receive it when you actively open the Mini-App.

Blockchain data:

Public wallet addresses, transaction hashes, and on-chain activity (publicly visible on TON blockchain anyway).

Third-party sources:

We do not currently purchase or share personal information with data brokers or advertising networks. We may receive limited data from payment processors (e.g., USDT transaction confirmation) or analytics providers.

2. How We Use Your Personal Information

We use your personal information for the following purposes:

- To provide and operate the Service (process gacha purchases, mint/redeem NFTs, run raffles, ship physical cards)
- To communicate with you (support, announcements, transaction confirmations)

- To personalise your experience (display your username/avatar, show your portfolio)
- For security and fraud prevention (verify wallet ownership, detect bots/abuse)
- To comply with legal obligations (KYC/AML if ever required, tax reporting for redemptions)
- For analytics and product improvement (understand usage patterns, fix bugs)
- To send marketing communications (only with your consent or where permitted; you can opt out anytime)

We do not sell your personal information and do not share it for third-party direct marketing.

3. How We Share Your Personal Information

We share personal information only in these limited cases:

- **Service providers** — Hosting providers, analytics (e.g., Google Analytics, Amplitude), email services, shipping carriers (only name/address for redemptions), payment processors (only necessary transaction data)
- **Telegram** — We receive Init Data directly from Telegram; we do not share data back to Telegram beyond what is required for Mini-App functionality
- **Legal requirements** — With law enforcement, regulators, or in response to valid legal process
- **Business transfers** — In connection with a merger, acquisition, or asset sale
- **With your consent** — Or as otherwise disclosed at the time of collection

Your profile (username, wallet-linked NFTs, raffle wins, etc.) may be visible to other users where you choose to make it public.

4. Cookies & Similar Technologies

We use cookies, local storage, and similar technologies for essential functions (session management, security), analytics, and to remember preferences. You can manage cookies via browser settings, but disabling them may break parts of the Service.

5. Security

We implement reasonable technical and organisational measures (encryption, access controls, server-side validation of Telegram Init Data) to protect your information. However, no system is 100% secure, and we cannot guarantee absolute security.

6. International Data Transfers

The Service is operated from Hong Kong and data may be processed in Hong Kong, the EU, or other countries. By using the Service you consent to such transfers.

7. Data Retention

We keep personal information only as long as necessary for the purposes described or as required by law (e.g., transaction records for tax purposes). Wallet addresses and on-chain activity are retained indefinitely as they are public blockchain data.

8. Your Choices & Rights

- **Opt-out of marketing** → Unsubscribe links in emails or contact us
- **Access, correction, deletion** → Email contact@collectorcrypt.tg with requests. We will respond within a reasonable time (usually 30 days)
- **Do Not Track** → We do not currently respond to DNT signals
- **Telegram data** → You can revoke Mini-App access anytime in Telegram settings, which will stop future Init Data sharing

Residents of certain jurisdictions (e.g., EEA, UK, California) may have additional rights (access, deletion, portability, etc.). We will honour verifiable requests to the extent required by law.

9. Children

The Service is not intended for anyone under 18. We do not knowingly collect data from children. If we learn we have, we will delete it immediately.

10. Contact Us

Questions, requests, or concerns? Email contact@collectorcrypt.tg