

# Privacy Policy

**Effective Date:** April 8, 2025

**Last Updated:** April 8, 2025

This Privacy Policy ("Policy") explains how **CashSplash** ("we", "us", or "our"), a Telegram Mini App, collects, uses, discloses, and protects your personal data when you use our services through Telegram or related platforms.

By accessing or using CashSplash, you agree to the terms of this Privacy Policy.

## 1. WHO WE ARE

**Legal Entity Name:** CashSplash

**Business Type:** Telegram Mini App

**Contact Email:** marketing.team@cashspalsh.app

**Jurisdiction:** European Union, India, Indonesia, Brazil and UAE.

## 2. SCOPE

This Policy applies to all users accessing the App through Telegram across our key markets: **European Union (EU), India, Indonesia, Brazil, and the United Arab Emirates (UAE).**

We comply with major data protection regulations, including:

- **General Data Protection Regulation (GDPR – EU & EEA)**
- **Information Technology Act, 2000 (India)**
- **Lei Geral de Proteção de Dados (LGPD – Brazil)**
- **Personal Data Protection Law (UAE)**
- **Indonesia Personal Data Protection Law (UU PDP)**

## 3. INFORMATION WE COLLECT

We may collect the following types of personal data:

### 3.1 Information You Provide Voluntarily

- **Telegram ID and Username**
- **Phone number** (only if shared)
- **Name and profile picture** (from Telegram)
- **Email address** (if entered)
- **Wallet or payment information** (for withdrawals or rewards)

- Any content submitted via forms, feedback, or support

### **3.2 Automatically Collected Information**

- Device type, operating system, and Telegram platform
- IP address
- User interaction data (e.g., task completions, clicks, reward claims)
- Error logs and diagnostic data

## **4. HOW WE USE YOUR DATA**

We use your personal data for the following purposes:

- To operate and provide the CashSplash services
- To reward users based on completed tasks
- To prevent fraud, abuse, and enforce our Terms
- To communicate with you via Telegram or email
- To conduct analytics and improve user experience
- To comply with legal obligations

## **5. LEGAL BASIS FOR PROCESSING (GDPR COMPLIANCE)**

If you are in the European Economic Area (EEA), our legal basis for collecting and using personal information depends on the context:

- **Consent** – Where you have given consent (e.g., optional marketing)
- **Contractual necessity** – To fulfil our obligations to you (e.g., payout processing)
- **Legal obligation** – Where processing is required by law
- **Legitimate interests** – For operational needs, fraud prevention, and service improvements

## **6. DATA SHARING AND DISCLOSURE**

We may share your information with:

- **Service providers** – For payment processing, analytics, or infrastructure
- **Telegram** – As per their developer platform usage
- **Regulatory authorities** – When legally required
- **Third-party advertisers or partners** – Only with user consent

- **We do not sell your personal data.**

## **7. INTERNATIONAL DATA TRANSFERS**

Your data may be transferred outside your country, including to the United States and the European Economic Area (EEA). We ensure all transfers comply with local regulations, including:

- **Standard Contractual Clauses (SCCs)**
- **Data Processing Agreements (DPAs)**

Adequate safeguard mechanisms for Brazil, India, and Indonesia

## **8. DATA RETENTION**

We retain personal data only as long as necessary to fulfil the purposes stated in this Policy or as required by law. Upon account deactivation or inactivity beyond 12 months, your personal data may be anonymized or securely deleted.

## **9. YOUR RIGHTS UNDER GDPR & OTHER LAWS**

Depending on your jurisdiction, you may have the right to:

- Access the personal data we hold about you
- Correct or update inaccurate data
- Request deletion of your data
- Withdraw consent at any time
- Object to processing for legitimate interests
- Lodge a complaint with a data protection authority

To exercise any of these rights, please contact us at **[legal@cashsplash.app](mailto:legal@cashsplash.app)**.

## **10. CHILDREN'S PRIVACY**

CashSplash is not intended for individuals under the age of **13** (or the applicable age in your jurisdiction). We do not knowingly collect data from children. If you believe we have, contact us immediately for removal.

## **11. SECURITY MEASURES**

We implement industry-standard security safeguards, including:

- End-to-end encryption for sensitive data

- Access controls and role-based data restrictions
- Data minimization and encryption at rest
- Secure data transfer protocols

However, no platform is 100% secure, and we cannot guarantee absolute protection.

## 12. THIRD PARTY DISCLOSURE

We may share your data with:

- **Tipalti, Inc.** – for processing payment withdrawals  
<https://tipalti.com/privacy-policy/>
- **Meta Platforms, Inc.** – for serving and managing ads  
<https://www.facebook.com/policy.php>
- **Google LLC** – for analytics, advertising, and security  
<https://policies.google.com/privacy>

We ensure data sharing is done securely, lawfully, and minimally.

## 13. COOKIES AND TRACKING

We do not use cookies directly. However, third-party services like Google or Meta may use tracking technologies under their own policies.

You may opt-out using:

- [Google Ad Settings](#)
- [Meta Ad Preferences](#)

## 14. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. When we do, we will notify users via Telegram or update the “Last Updated” date above and at the end of this document. Continued use after such changes constitutes acceptance of the revised policy.

## 15. CONTACT US

For questions or concerns about this Privacy Policy, reach out to:

### **CashSplash**

Email: [marketing.team@cashsplash.app](mailto:marketing.team@cashsplash.app)

Subject: Privacy Request

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