

Privacy Policy

Effective Date: March 27, 2026

Data Controller: Crypton Xyz Ltd (Reg. No. 238544)

Registered Address: F2-2A, Oceanic House, Providence Estate, Mahé, Seychelles.

Contact Email: corporate@crypton.xyz

1. Introduction

Welcome to Open Academy. Crypton Xyz Ltd ("we," "us," or "our") is committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, and safeguard your information in compliance with global standards, including GDPR principles.

2. Personal Information We Collect

We collect information you provide directly, data from third-party platforms, and information generated during your interaction with the Service.

A. Stored Account & Profile Data

- **Personal Identifiers:** Email address, unverified email, profile username, birth date, and phone number.
- **Preferences:** Language code, timezone, theme settings (e.g., `is_dark_theme`), and advertising consent.
- **Platform Identifiers:** Telegram ID, Telegram username, Discord username, and Base Mini App ID.
- **Blockchain Wallets:** EVM wallet, WAX wallet, and TON wallet addresses.
- **Financial & Gamification Data:** Account balance, points, investment fund balance, Nutcracker count/rarity, and promotional box/spin usage data.
- **Marketing Data:** UTM data, referral discount availability, and duplicated account flags.
- **Status & Usage:** Account activation status, ban status, payment status, date joined, and last login time.
- **Integrations & Models:** Notion user ID, capital/knowledge metrics, referral info (code, balance, profit), contact change history, avatars, and session data.

B. Non-Persistent Data (Processed but Not Stored)

We process the following data during HTTP requests or authentication flows for security and functionality, but do not retain it in our permanent databases:

- **Technical Identifiers:** IP address (extracted via middleware for cache only), User Agent, Accept-Language, and Referer headers.
- **Telegram Mini App (TMA) Init Data:** First/last name, Premium status, photo URL, and PM permissions (parsed and discarded).
- **Google OAuth Response:** Email verification status, Google ID (sub), profile picture, name, and locale.

3. AI Interaction & Voice Data

Open Academy offers AI-powered learning experiences.

- **Voice Input:** To use voice interaction, you must grant explicit microphone permission.
- **Processing:** Audio recordings are processed to generate text transcriptions for AI responses.
- **Training:** We use de-identified chat logs and transcriptions to develop and enhance our AI features and educational models.
- **Retention:** While audio is discarded after transcription, text chat conversations are retained indefinitely to maintain your learning progress until you request deletion.

4. Data Storage & Third-Party Sharing

- **Hosting:** All data is stored on secure servers provided by **Hetzner Online GmbH**.
- **Analytics:** We use Google Analytics and Yandex Metrica to monitor service performance.
- **Payments:** Transactions are processed by third-party providers (Stripe, Crypto processors); we do not store payment card numbers.

5. Data Retention & Your Rights

- **Inactivity:** Inactive accounts and associated data are automatically deleted after **12 months** of inactivity.
- **Your Rights:** You have the right to access a copy of your data, correct inaccuracies, or request erasure. Contact us at corporate@crypton.xyz to exercise these rights.