

Privacy Policy

Effective date: September 9, 2020

Welcome to Swash's privacy policy.

Swash ("us", "we", or "our") is a browser extension on Mozilla Firefox, Google Chrome, Microsoft Edge and Brave browser which uses your data to provide a Data Union for the Streamr Marketplace. By installing the Swash extension, you agree to the collection and use of information in accordance with this policy.

Swash respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you use our services. Please also use the Glossary at the end of this document to understand the meaning of some of the terms used in this privacy policy.

Important Information and Who We Are

Purpose of This Privacy Policy

This privacy policy aims to give you information regarding the collection, use, and disclosure of browsing data when you use the Swash browser extension on Mozilla Firefox, Google Chrome, Microsoft Edge, Brave, Kiwi and Yandex browsers. In addition, this privacy policy will tell you about your privacy rights and how the law protects you.

Swash is not intended for children and we do not knowingly collect data relating to children. In order to protect the privacy of children, the minimum age for signing up to Swash is 18 years.

Controller

SwashData Tech Oy LLC is the controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact Details

If you have any questions about this policy or if you would like to exercise your rights to your personal data described further below, please contact our data privacy manager in the following ways:

- Full name of legal entity: SwashData Tech Oy LLC
- Email address: contact@swashapp.io
- Website: <https://swashapp.io>

You have the right to make a complaint at any time with the data protection authorities concerning our processing of your personal data. You can make the complaint with the data protection authority of the EU member state where you have your permanent residence or where you work, or where you find that a potential breach with regard to your personal data has occurred.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

How We Collect Information from You

Swash is a browser extension for collecting and aggregating your browsing activities. This extension collects information about your browsing activities and gives you, ability to sell your data on the Streamr Marketplace.

There are two builds for this extension, one for Firefox browser and the other for all chromium-based browsers. The extension consists of some modules. Each module has some Data Collectors and each Data Collector is responsible for collecting a specific data regarding its module. A Data Collector collects data using one of these methods:

- Running a JavaScript code in the context of a specific page
- Capturing requests sent to/responses received from a specific domain
- Reading your browser information

Information We Collect

Each module of Swash collects several different types of information. Please see the “Data collectors” section of this Privacy Policy below for examples of the different types of data collected by Swash.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you unless you give your express consent (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Data Collectors

In this section all Swash data collectors and a short description for each one of them are listed.

Shopping data collectors

We collect these data points from shopping websites like Amazon and eBay:

Collector name	Collector description
Visited pages	Collects all pages that user has visited
Visiting Graph	Collects all navigations that user has done in
Search Query	Collects search query and search category
Search Suggestion	Collects a search suggestion that has been selected by user
Search Result	Collects search results, search category, and corresponding search query
clicked search results	Collects information about a search result link that has been clicked by user
Selected Items	Collects product title, product category and page title for products that has been selected by user
Items in cart	Collects all products that has been added to the cart by user
Items in wishlist	Collects all products that has been added by user in wish list
Items for buy	Collects all products that has been selected by user for buying

Beauty and fashion data collectors

We collect these data points from Beauty and fashion websites like sephora and bathandbodyworks:

Collector name	Collector description
Search Query	Collects search query and search category
Search Suggestion	Collects a search suggestion that has been selected by user
Search Result	Collects search results, search category, and corresponding search query
clicked search results	Collects information about a search result link that has been clicked by user
Selected Items	Collects product title, product category and page title for products that has been selected by user
Items in cart	Collects all products that has been added to the cart by user
Items in love list	Collects all products that has been added by user in love list
Items for buy	Collects all products that has been selected by user for buying

Social media data collectors

We collect these data points from Social media websites like facebook and twitter:

Collector name	Collector description
Search	Collects all search queries that a user has entered in search bar
Links clicked by user	Collects all pages that a user has visited
Visiting Graph	Collects all navigations that a user does
Published posts	Posts that were published by this person
Games	Games a person likes
Movies	Movies this person likes
Music	Music this person likes
Television	TV shows this person likes
Books	Books this person likes
Follow action	Collects all user's follow actions
Unfollow action	Collects all user's unfollow actions
Mute action	Collects all user's mute actions
Unmute action	Collects all user's unmute actions
Like action	Collects all user's like actions
Retweet	Collects all user's retweet/reshare actions

Search data collectors

We collect these data points from Search Engines like google and yahoo:

Collector name	Collector description
Search Query	Collects all search queries that a user enter in search bar
Search Result	Collects search results, search category, page number and corresponding search query
clicked link	Collects links clicked by user from search result
ads clicked link	Collects advertising links clicked by user from search result

Surfing data collectors

We collect these data points from all websites:

Collector name	Collector description
Visited domain	Collects all domains that a user has visited
Visiting Graph	Collects all navigations that user has done in all domains
Create Bookmark	Collects all bookmarks that created by a user
Page Information	Collects information about the page being visited

News media data collectors

We collect these data points from news websites like BBC and CNN:

Collector name	Collector description
Visited page	Page visited by user in these domains
Clicked news	The news post click by user
News details	Details of the news post that is being read by the user

Music data collectors

Collector name	Collector description
Saved Tracks	Get a list of the songs saved by the user.
Saved Albums	Get a list of the albums saved by the user.
Current Playlists	Get a list of the playlists owned or followed by the current user.
Currently Playing	Get the object currently being played on the user's account.
Current Playback	Get information about the user's current playback state, including track, track progress, and active device.
Recently Played	Get tracks from the current user's recently played tracks.
Followed Artists	Get the current user's followed artists.
video./music time duration	Collects the duration of a video watched/music played by a user

What We Do with the Collected Data

We use your data to provide a Data Union for the Streamr Marketplace. Swash aggregates the collected data to create a Data Union. We push the collected data to the Streamr Marketplace for selling as Data Union. For every module, we send all the collected data to a predefined stream on the Streamr Network. A Data Union has been defined on Streamr Marketplace to aggregate these data. Buyers can subscribe to the streams of this product for a specific period of time by paying the requested cost. WE ARE NOT RESPONSIBLE FOR ANY MISUSE OF DATA PROVIDED TO THE BUYERS.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please see below, to find out more about the types of legal basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We may process your personal data to do the following:

- Allow you to receive payments for data you provide on the Marketplace;
- Allow you to receive content from the data products that you have purchased or subscribed to;
- Seek your comments, feedback and suggestions on the functionality Swash;
- Notify you of changes, upgrades or problems in the functionality of Swash;
- Send you communications which you have requested and which may be of interest to you.

Legal Basis for Processing Your Data

The processing of your personal data is necessary for the performance of the contractual relationship between Swash and you.

We may also process your personal data based on our legitimate interests. This means that we have a legitimate interest to process your personal data for example based on our relationship with you as a user, there is a limited privacy impact on you, and you should reasonably expect your data to be used that way. Swash has a legitimate interest, for example, to process your personal data to develop its business, based on the contractual relationship between you and Swash.

We may also process your personal data for specific purposes based on your consent, if we have separately requested and obtained your consent.

Your Controls and Choices

Controls and choices

We provide you with certain controls and choices regarding the data collected on your browser:

- **Enabling/Disabling Swash.** You are able to enable/disable the Swash extension. When the extension is disabled nothing will be collected by the extension.
- **Delay on sending data.** You are able to make custom delays on sending data. It helps you watch data before being sent to the stream and it gives you the ability to cancel any data sending action.
- **Text masking.** This feature allows you to actively mask specific text (characters, digits, single words or combination of them) within the data being captured and shared via the extension. This allows you to cover sensitive information that might be present, for example, within Facebook or Twitter posts or, less probable, search queries. One could for example add any variation of his/her own name, phone number, email, address, close people names etc.
- **Exclude URLs.** This option allows you to specify which URLs you would like to exclude from data collection for all modules. You can use different expressions to exclude an exact match URL, an entire subsection of a URL path or even more advanced rules. Rules applied for this feature will supersede any module's internal logic, so you can have peace of mind that anything applied correctly here will be followed by all modules.

Data Privacy

We provide you with a privacy mechanism to ensure the privacy of data getting collected by modules. The mechanism works based on the data type and the privacy level. The table below shows how the privacy mechanism transforms the data based on the data type.

Data Type	Lowest Privacy	Medium Privacy	High Privacy
URL	No changes	Global Masking path name	Remove path name
Time	No changes	Remove hours	Remove months
TimeString	No changes	Remove hours	Remove months
Text	Replace masked text with '*'	Replace masked text with null	Remove texts that has masked text
Id	No changes	Global masking	Nullify
UserInfo	No changes	Global masking	Nullify
UserAttr	No changes	Global masking	Nullify

The first column of the table shows the different data types and the first row of the table shows the different privacy levels. The privacy enforcement mechanism works as follows:

- **Lowest Privacy Level:** No transformation is applied on the collected data.

Table below shows an example of the Lowest Privacy Level enforcement. In this table the *Input* column represents a sample of the collected data for each data type and the *Output* column represents the data after the policy enforcement.

Data Type	Input	Output
URL	https://www.test.com/path1/path1-1/sample?var1=val1&var2=val2	https://www.test.com/path1/path1-1/sample?var1=val1&var2=val2
Time	1565689441313	1565689441313
TimeString	Tue Aug 13 2019 14:14:01 GMT+0430 (Local Daylight Time)	Tue Aug 13 2019 14:14:01 GMT+0430 (Local Daylight Time)
Text	This is a simple text that contains Swash as a personal data	This is a simple text that contains ***** as a personal data
Id	324242342	324242342
UserInfo	John Doe	John Doe
UserAttr	male	male

- **Medium Privacy Level:**

The table below shows an example of the Medium Privacy Level enforcement. In this table the *Input* column represents a sample of the collected data for each data type and the *Output* column represents the data after the policy enforcement.

Data Type	Input	Output
URL	https://www.test.com/path1/path1-1/sample?var1=val1&var2=val2	https://www.test.com/bc777/b29fca9/4f4069
Time	1565689441313	1565638200000
TimeString	Tue Aug 13 2019 14:14:01 GMT+0430 (Local Daylight Time)	Tue Aug 13 2019 00:00:00 GMT+0430 (Local Daylight Time)
Text	This is a simple text that contains Swash as a personal data	This is a simple text that contains as a personal data
Id	324242342	e0ede487750bac7d36a20032720e43ea00e60c5e5e28efcdd121cddb952b274
UserInfo	John Doe	2ec028ae429488c7489b1a94a15df055af1083dfc00fe64deed30fafcd532994
UserAttr	male	d60e6883da0f8c8bceba33dd6b280ef189f388c8fe170bda20551c146f2120ae

- **High Privacy Level:**

The table below shows an example of the High Privacy Level enforcement. In this table the *Input* column represents a sample of the collected data for each data type and the *Output* column represents the data after the policy enforcement.

Data Type	Input	Output
URL	https://www.test.com/path1/path1-1/sample?var1=val1&var2=val2	https://www.test.com
Time	1565689441313	1546300800000
TimeString	Tue Aug 13 2019 14:14:01 GMT+0430 (Local Daylight Time)	Tue Jan 01 2019 03:30:00 GMT+0330 (Local Standard Time)
Text	This is a simple text that contains Swash as a personal data	
Id	324242342	
UserInfo	John Doe	
UserAttr	male	

Identity Anonymity

We have provided you with a mechanism to preserve the anonymity of your identity. This mechanism works as follows:

- With the “Lowest” anonymity setting, your ID will be a randomly generated string which would be the same across all modules (Amazon, Facebook, Search etc.).
- With the “Medium” anonymity setting, your ID will be a randomly generated string which would be different across all modules.
- With the “High” privacy setting, your ID will be a randomly generated string which would be different across all modules. Additionally, within each module your ID will be changed with a new randomly generated ID for each data collection event.

Swash automatically calculates the privacy and anonymity level of each data point based on the data point’s module name, module’s category and the data which is being collected. As an example anonymity level for the News category is low. But when it comes to Social media modules the anonymity level would be high. The Surfing module has a high privacy level while Music modules have medium to low privacy levels.

Disclosures of Personal Data

In addition to including your data in the Data Unions, we may share your personal data with the parties set out below for the purposes set out in section “**Purposes for which we will use your personal data**” above.

- SwashData Tech Oy LLC
- Streamr Network AG
- Data buyers on the Streamr Marketplace

- Third party subcontractors (e.g. hosting service providers) in providing our services, in which context they may also process your personal data.

Transfer of Data

The data that has been collected by Swash, may be transferred to - and maintained on – Streamr network nodes located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Any transfer of your personal data to a country outside the EU or the EEA will be made only provided that the EU Commission has decided that the third country ensures an adequate level of protection in accordance with the EU General Data Protection Regulation (679/2016) or, if such decision has not been made for the country in question, in accordance with the EU Commission’s standard contractual clauses for data transfers. For more information about such clauses, see this link:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en. For clarity, the EU Commission has determined that Switzerland is a country with an adequate level of protection.

Your consent to this Privacy Policy followed by your consent for collecting data in Swash browser extension represents your agreement to that transfer.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Security of Data

Swash is concerned about the security of your data. We have implemented technical security measures that are designed to help protect your information from unauthorized access, disclosure, use and modification. From time-to-time, we review our security procedures to consider appropriate new technologies and methods.

Please be aware, though, that despite our efforts, no security measures are perfect or impenetrable. We cannot ensure, and do not warrant or guarantee that the information you transmit to Streamr nodes will remain secure, nor do we guarantee that this information will not be accessed, disclosed, altered, destroyed or used in an unauthorized manner.

If we learn of a security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on our website or in the Swash extension if a security breach occurs. Depending on where you live, you may have a legal right to receive a notice of a security breach in writing.

Data Retention

We will retain your personal data only for as long as it is relevant for the purpose for which it was collected and will delete any personal data that is no longer relevant. This means that we will keep your personal data that is necessary to implement our agreement with you for as long as you maintain a Swash user account or for as long as reasonably necessary to fulfil the purposes we collected it for, whichever is longest, as well as until the expiry of any applicable claim periods after this. We will also comply with any applicable laws or statutes which obligate us to retain your

personal data for a specific time period, such as the mandatory retention periods under accounting laws and regulations.

As regards any personal data that we process based on your consent, we will retain such data for as long as it is relevant for the purpose for which the data was collected, unless you withdraw your consent before that.

You may request to close your Swash account at any time. After we receive your request to close the account, we will do so without delay, as long as you have no outstanding obligations as a data provider on the Streamr Marketplace. We will delete all your personal data when your account is closed, unless there are applicable laws or statutes which obligate or allow us to retain your personal data longer.

If you have entered into a contract with a third party data provider, any such contract may contain further obligations as to for how long the personal information is kept.

Your Legal Rights

You have various rights with regard to your personal data. Please note that the particular rights may be subject to qualifications or specific requirements arising from, for example, applicable laws, that are not fully described here.

- Right to access your personal data: You have the right to obtain confirmation from us whether your personal data is being processed. You also have the right to access your personal data and to obtain certain information, such as the purposes of processing your personal data and the types of personal data involved.
- Right to rectification: You have the right to request us to correct inaccurate personal data about you.
- Right to erasure: You have the right to request us to erase personal data about you in certain situations, such as if the data is no longer necessary for the purposes for which it was collected, if processing such data is unlawful or if the data was processed based on consent and you withdraw your consent.
- Right to restriction of processing your personal data: You have the right to restrict processing of your personal data in certain situations. If you exercise this right, we are generally only allowed to store the data in question. You might exercise this right, for example, if you believe that the personal data we hold about you is inaccurate, in which case your right to restriction of processing would apply for the time that it takes us to verify whether your belief is correct.
- Right to object to processing your personal data: You have at any time the right to object to processing your personal data for direct marketing purposes. You are also entitled to, on the grounds of your particular situation, object to processing of your personal data that we do based on our legitimate interest.
- Right to data portability: You have the right to obtain your personal data in a structured, commonly used and machine-readable format and to transfer the data to another controller, if we process your personal data based on your consent or because of a contract that we have entered with you. For this right to be available to you, our processing of your personal data must take place by automated means.

- Right to withdraw your consent: To the extent we process your personal data based on your consent, you have the right to withdraw your consent at any time. You can do so by sending an email to contact@swashapp.io. You can also manage your consent preferences by ticking the relevant boxes in the modules section of settings in Swash extension. Withdrawing your consent does not affect the lawfulness of the processing of your personal data based on consent before its withdrawal.
- Right to make a complaint with the data protection authorities: You have the right to make a complaint with the data protection authorities concerning our processing of your personal data. You can make the complaint with the data protection authority of the EU member state where you have your permanent residence or where you work, or where you find that a potential breach with regard to your personal data has occurred.

Glossary

- **Data Union**

A Data Union is a data product that sits on the Streamr Marketplace. It will contain a number of data streams that are pushed from multiple sources. End users can push the data they create to a larger saleable product and receive automatic payment every time that product sells

- **Data Collector**

A data collector is a piece of code in the Swash extension that is responsible for collecting a specific data.

- **Extension**

A browser extension is a small software module for customizing a web browser. Browsers typically allow a variety of extensions, including user interface modifications, ad blocking, and cookie management.

- **Module**

A Swash module is a collection of some relevant Data Collectors that has been brought together to collect data regarding a specific domain and its subdomains.

- **Streamr**

Streamr is a crowdfunded open source project with contributors around the world. It provides a complete system to tokenize the value of real-time data to enable a new way for machines and people to trade it on a decentralized P2P network.

- **Streamr Marketplace**

Streamr Marketplace is an application that enables users to buy and sell access to real time data content on the Streamr Network. The Marketplace is filled with both paid and free products, offering data producers an opportunity to either monetise their data or make it freely available to everyone.

- **Swash**

Swash is a browser extension that collects your browsing activities and sends them to some specific streams on the Streamr network in order to aggregate browsing data as a Data Union for selling on the Streamr Marketplace.