

Privacy Policy of novaWallet solution

novaWallet is an innovative digital identity wallet that requests, handles and manages verifiable credentials to allow users to consume online services. This solution interacts with different technologies and protocols, including Blockchain. In accordance with the definition given in the General Data Protection Regulation 2016/679 (GDPR), to ensure its proper functioning, novaWallet processes personal information. Consequently, this data processing is subject to certain legal requirements.

Purpose of the treatment

novaWallet process data only to what is strictly necessary for: (i) processing information requested to user by issuers during credential issuance, (ii) managing the verifiable credentials issued to the user, and (iii) processing the verifiable credentials stored in the device when requested by a verifier. novaWallet processes all the information in the end-user device and respects all the principles on data processing enshrined in Art. 5 of the GDPR. This is in accordance with Art. 5(b), as novaWallet will process personal data only “for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes”.

Consent of the data subject

The GDPR states in Art. 4(11) that valid consent has to be ‘freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her’. In accordance with Article 6(1a) of the GDPR, novaWallet employs consent as legal basis for the data processing. Please, take notice that consent can be revoked, as stated in Art. 17 of the GDPR.

Data Controller

Means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law’. In light of the above, and taking into account that data is not collected, only shared with third parties on user demand, novaWallet does not act as a Data Controller of your personal data.

Data Processor

‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller’. Since all the personal information

is processed on the device, and shared with third parties under user demand, novaWallet is not a processor.

Data Protection Officer

According to Art. 37 of the GDPR, the Data Controller and the Data Processor are obliged to appoint a Data Protection Officer if the data process entails certain risks for the privacy and the fundamental risks of the data subject. This includes when the “processing is carried out by a public authority or body” or when it consists of “processing operations which [...] require regular and systematic monitoring of data subjects on a large scale”. The DPO appointed for the present processing is Mr. Luis Pérez Freire (gradient@gradient.org).

Right to rectification

The GDPR entrusts the data subject with certain rights regarding their relevant personal data. Among them there is the ‘right to rectification’, enshrined in Art. 16. Accordingly, the data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him/her. This provision includes ‘the right to have incomplete personal data completed, including by means of providing a supplementary statement’. Please, get in touch with the DPO or the Data Controller of the issuer or verifier with which information has been exchanged for exercising your data subject rights.

Right to lodge a complaint

The data subject can lodge a complaint to the relevant supervisory authority to guarantee their rights.

Data retention

Also known as ‘storage limitation’, this is one of the cornerstone principles relating to the processing of personal data, enshrined in Art. 5(e) of the GDPR. Following this disposition, the Data Controller will store your information only for 1 day at maximum after the end of your participation, or the retention period required by law, whichever is longest, and for the applicable statute of limitations period thereafter. It must be highlighted that for a Data Controller to comply with Art. 44 of the GDPR, it must not transfer personal data outside the EU/EEA space.