

Brossis Privacy Policy

Brossis Privacy Policy

Effective Date: August 25, 2026

This Privacy Policy describes how Brothers & Sisters ("Brossis," "we," "us," or "our") collects, uses, discloses, and protects information when you use the Brossis platform, Telegram Mini App, and related services (collectively, the "Service").

1. Information We Collect

1.1 Information You Provide Directly

- **Account and Telegram information:** your Telegram user ID, username, and profile information made available to us through the Telegram platform.
- **Wallet information:** your connected TON-compatible wallet address and transaction history related to your membership contributions, Community Reserve Fund balance, and any assistance or referral payments.
- **Identity verification information:** information you submit to our third-party identity verification provider, Dikit, including government-issued identification, a liveness check (e.g., a selfie or short video), and related verification data. Dikit processes this information on our behalf and under its own privacy practices; see Section 4.
- **Family representative information:** the name and contact information of the person you designate to receive community assistance on your behalf, and equivalent information submitted by a family representative when making an assistance request.
- **Assistance request documentation:** supporting documents submitted in connection with a community assistance request (for example, a death certificate or equivalent), and any communications related to that request.
- **Communications:** messages you send us for support, governance participation, or other purposes.

1.2 Information Collected Automatically

- **Usage data:** how you interact with the Mini App, including pages viewed, actions taken, and timestamps.
- **Device and technical data:** device type, operating system, and similar technical identifiers made available through the Telegram platform.

1.3 Blockchain Information

Transactions on the TON blockchain, including wallet addresses, transaction amounts, and transaction hashes, are recorded on a public, distributed ledger. This information is not private and is not within Brossis's control once submitted to the blockchain, even though we also maintain our own internal records of these transactions for transparency and audit purposes.

2. How We Use Information

We use the information described above to: - create, verify, and administer your membership, including confirming your identity and preventing duplicate memberships; - calculate and track your Community Reserve Fund balance and membership status, including your progress through the one-year waiting period; - process community assistance requests, including verification, Governance Council review, and payment; - operate the referral program and calculate referral rewards; - communicate with you about your membership, assistance requests, and changes to the Service or these policies; - maintain records required for transparency, audit, and governance purposes; - detect, prevent, and investigate fraud, abuse, and violations of our Terms of Use; - comply with applicable law, regulatory requirements, and lawful requests from public authorities; and - improve and secure the Service.

3. How We Share Information

We do not sell your personal information. We may share information as follows:

3.1 Service providers. With third-party service providers who perform functions on our behalf, including Didit (identity verification), Telegram (platform infrastructure), and any hosting, analytics, or payment infrastructure providers we engage. These providers are permitted to use your information only as necessary to provide services to us.

3.2 Governance and review. With members of the Review Circle and Governance Council to the extent necessary to review and approve a community assistance request, consistent with our governance rules.

3.3 Family representatives. With your designated family representative, to the extent necessary to process an assistance request following your death.

3.4 Legal and safety. Where we believe disclosure is necessary to comply with a legal obligation, protect the rights, property, or safety of Brossis, our members, or the public, or investigate fraud or violations of our Terms of Use.

3.5 Business transfers. In connection with a merger, acquisition, reorganization, or sale of assets, subject to appropriate confidentiality protections.

3.6 With your consent. For any other purpose disclosed to you at the time of collection, or with your consent.

4. Third-Party Identity Verification (Didit)

Identity verification is performed by Didit, an independent third-party provider. When you complete identity verification, your information is processed under Didit's own privacy policy and terms, in addition to this Policy. We recommend reviewing Didit's privacy policy directly. Brossis does not store raw identity documents (such as scanned ID images) beyond what is required for verification and legal compliance, and does not retain such documents longer than necessary unless required by law.

5. Data Retention

We retain your information for as long as your membership is active, and for a reasonable period thereafter as necessary to: - process any pending or future community assistance request tied to your membership history; - comply with legal, tax, audit, and recordkeeping obligations; - resolve disputes and enforce our agreements.

Retention periods vary by data type; identity verification data, assistance request documentation, and financial transaction records are generally retained longer than routine usage data, consistent with applicable legal requirements.

6. Your Rights and Choices

Depending on your place of residence, you may have rights to: - access the personal information we hold about you; - request correction of inaccurate information; - request deletion of your information, subject to our legal, contractual, and recordkeeping obligations (for example, we may be unable to delete information tied to a completed assistance payment or required audit record); - object to or restrict certain processing; and - withdraw consent where processing is based on consent.

To exercise these rights, contact us using the details in Section 10. We may need to verify your identity before responding to a request.

Please note that information already recorded on the TON blockchain cannot be deleted or altered by Brossis, as it is maintained on a decentralized, public ledger outside our control.

7. International Data Transfers

Brossis is based in the United States, and the Service is operated using infrastructure and service providers that may be located in other countries. Where we transfer personal information internationally, we take reasonable steps to ensure it receives an adequate level of protection consistent with applicable law.

8. Data Security

We use reasonable administrative, technical, and physical safeguards designed to protect your information, including multisignature authorization for payment releases and audit trails for governance decisions. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security, particularly with respect to blockchain transactions, which are irreversible and publicly visible once confirmed.

9. Children's Privacy

The Service is not directed to individuals under 18 years of age, and we do not knowingly collect personal information from anyone under 18. If we learn that we have collected information from someone under 18, we will take steps to delete it.

10. Contact Us

If you have questions about this Privacy Policy or wish to exercise your privacy rights, please contact us at: info@brossis.org.

11. Changes to This Policy

We may update this Privacy Policy from time to time, consistent with the governance process described in our Terms of Use. Material changes will be communicated to members through the Service, and the "Effective Date" above will be updated accordingly. Your continued use of the Service after a change takes effect constitutes acceptance of the revised Policy.