

APPLICATIONS PRIVACY POLICY

We develop and publish iOS applications and we may collect, store and process some data, including personal data. This privacy policy ("Privacy Policy") sets out the main principles on which the data collected from you, or that you provide to us, will be processed by us. This Privacy Policy also aims to remind you about your rights and to provide you with all the elements you need to exercise them. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at donaldmarshall83892@outlook.com.

If you have any questions related to this Privacy Policy or our practices around privacy and data protection in general, please don't hesitate to contact us at donaldmarshall83892@outlook.com.

This Privacy Policy outlines how the mobile application handles user data.

The app functions as a photo and video editor, allowing users to enhance portraits using neural network technology that generates highly realistic facial changes automatically.

Only the photos you choose for editing are uploaded to the cloud. During the editing process, these photos are temporarily stored on cloud servers and encrypted using a key stored locally on your device.

Face Data Photos are kept in the cloud for 24-48 hours after your last edit, giving you the option to return and make further adjustments.

We do not use your photos for any purpose other than to provide the portrait editing services offered by the app.

As for videos, they are processed entirely on your device, meaning we do not receive, collect, or share any video data.

I. PERSONAL INFORMATION WE COLLECT FACE DATA

Face Data is not retained, all data is deleted after 24 hours.

To use certain features of the application, you may choose to grant us access to your camera or photo album to retrieve photos stored on your device. We only access your camera and/or photo album if you voluntarily give us permission. When using the app, we analyze the position and shape of your facial features (the six sense organs) from the selected photos, provide feedback, and show the effect or conclusions based on that analysis. **We do not store or share the face data photos, facial data, effect drawings, conclusions, or feedback with third parties once the analysis is complete.** Please avoid using the app to process content that could reveal personal information.

When using the app, we may collect the following information:

- Photos you choose to edit via the app, either from your camera or camera roll (with your permission). We only access the specific images you select for editing, not your entire photo album, even if you have

granted access. Each photo uploaded is encrypted, with the encryption key stored locally on your device. As a result, only your device can view the edited photo.

- While we do not request metadata (like geotags) attached to your photos, such data may be included by default. We take steps to remove any metadata from photos you upload for editing.

- Facial feature data is collected separately from the photos strictly to enable the editing functionality. This data is not considered biometric, does not include personal identification information, and is not uploaded or stored on our servers. We do not access photos stored on your device.

Face Data: We only use the photos you provide for editing purposes and do not collect any other face data. If you wish to withdraw consent or request data deletion, please contact us via email with a description of your request for prompt assistance. Facial feature data is solely used to

enhance the photo editing features and provide improved special effect results.

Additionally, we may collect app usage information, such as your preferred language, the dates and times you first installed and last used the app, and details about your interactions with the app.

If you subscribe to the app, we also collect purchase history, confirming whether you are a paid subscriber.

II. HOW WE USE YOUR PERSONAL INFORMATION FACE DATA

We only use the photos you provide in the application for editing purposes and nothing else. However, we may use other non-photo-related information for the following purposes:

- To operate and improve the application;
- To enable you to access and use app features;
- To create and manage your account if you choose to log in using a social media account;
- To communicate with you about the app, including sending updates, announcements, and security notifications via push notifications, and to respond to your inquiries, questions, and feedback;
- To provide technical support and maintain the app;
- For compliance, fraud prevention, and safety. We may use your personal information and share it with law enforcement, government agencies, or private parties if necessary to: protect our rights, your rights, or the rights of others (including in legal claims); enforce the app's terms and conditions; and investigate, prevent, and protect against fraudulent, harmful, unauthorized, or illegal activities.

III. HOW DO WE USE UPLOADED IMAGES FACE DATA?

When you use the app to process facial photos, we analyze the facial data by identifying the position, shape of the five facial features, and gender. After processing, we provide you with the special effect

images. If you withdraw or revoke consent for us to collect and process your facial features, we will immediately stop all related activities.

Due to limited processing capabilities on mobile devices, we use cloud servers to handle image processing. **Face Data Photos are stored in the cloud temporarily for up to 24 hours before they are automatically deleted.**

Your images are kept secure and confidential.

They are transmitted via SSL/TLS encryption and are solely used for background removal, after which the processed images are made available for download.

We do not share, publish, or use your images for any other purposes.

IV. HOW WE SHARE YOUR PERSONAL INFORMATION FACE DATA

We do not share user face data photos or videos with third parties. However, we may share non-photo and non-video information in the following situations:

- Affiliates: We may share app usage data with our subsidiaries and affiliates for purposes aligned with this Privacy Policy.
- Service Providers: We may share your personal data with service providers who assist us in operating the app (such as for customer support, hosting, analytics, email delivery, marketing, and database management). These third parties can only use your personal information as directed by us and in line with this Privacy Policy, and they are prohibited from using or disclosing it for any other reason.
- Advertising Partners: We may allow third-party cookies and tracking tools to be used by our advertising partners to collect information from your device, helping us analyze app usage.
- Third-Party Platforms and Social Media Networks: If you connect the app to third-party services or social media platforms (e.g., by logging in using your social media account or linking your app account to a third-party service), we may share personal information that you've authorized (e.g., uploading a photo or video to social media). The third party's use of your information is governed by their own privacy policy and terms.
- Professional Advisors: We may disclose personal information to professional advisors like lawyers, auditors, bankers, and insurers, as needed for the services they provide.
- For Compliance, Fraud Prevention, and Safety: We may share personal information for purposes of compliance, fraud prevention, and ensuring safety, as mentioned earlier.
- Business Transfers: In the case of a business transaction (like a merger, acquisition, or sale of assets) or a potential one, we may sell, transfer, or share your personal information as part of the deal. This could also happen in the event of bankruptcy or dissolution.

V. COOKIES AND TRACKERS

1. We use cookies and other software development kits (“SDKs”) and third-party libraries. Our Platforms uses the following categories of cookies:

Strictly necessary cookies

These are cookies that are required for the operation of our Platforms. They include, for example, cookies that enable you to load webpages.

Analytical/performance cookies

These cookies allow us to recognize and count the number of visitors to our Platforms and to see how visitors move around our Platforms. This helps us to improve the way our Platforms works, for example, by ensuring that visitors are finding what they are looking for easily.

Functionality cookies

These are used to recognize you when you return to our Platforms. This enables us to personalize our content for you and remember your preferences (for example, your choice of language or region).

VI. THIRD PARTY WEBSITES

Our Platforms may contain links to third party websites. If you follow a link to a third-party website, please note that this Privacy Policy does not apply to those websites. We are not responsible or liable for the privacy policies or practices of those websites, so please check their policies before you submit any data to those websites.

VII. SECURITY

1. We take data security seriously. We implement and maintain appropriate technical and organizational measures including resilient security systems and protocols to protect the personal data we store.
2. We have put procedures in place to deal with any suspected data security breach and will notify you and applicable regulator of a suspected breach where the breach may cause a risk to you.
3. Our security procedures mean that we may occasionally request proof of identity before we are able to disclose personal data to you.

IX. ACCESSING YOUR PERSONAL DATA AND YOUR RIGHTS

As a result of us collecting and processing your personal data, you have the following legal rights:

1. To access personal data we hold on you;
2. To request us to make any changes to your personal data if it is inaccurate or incomplete;
3. To request your personal data is erased where we do not have a compelling reason to continue to process such personal data in certain circumstances;

4. To receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the personal data is based on:

(i) your consent;

(ii) our necessity for performance of a contract to which you are a party to; or

(iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means;

5. To object to, or restrict, our processing of your personal data in certain circumstances;

6. If we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;

7. To object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you;

8. If we are processing your personal data with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal data

conducted pursuant to lawful processing grounds other than consent. You may do so by contacting us;

X. OUR POLICIES CONCERNING CHILDREN

Our Platforms are not intended for children (under the age of 13 or such higher age as required by applicable law). We do not knowingly collect or solicit any personal data or target interest based advertising to children and we do not knowingly allow children to register for or use the Platforms. Children should not use our Platforms or send us any personal data about themselves at any time. In the event that we learn that we have inadvertently gathered personal data from children, we will take reasonable measures to promptly erase such information from our records.

XI. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please contact us at donaldmarshall83892@outlook.com.

XII. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at donaldmarshall83892@outlook.com.