

PRIVACY POLICY

LAST UPDATED: June 20, 2024

INTRODUCTION

Our Platforms means mobile application Family Locator: GPS Tracker ("App"). You know our app but as a legal entity we are Galetskiav, a Company ("We", "Our", or "Us") registered in Belarus. Any related documentation; any images, logos, music, photographs, and video content that are incorporated into and form part of our App and etc. are managed, and operated by Us ("Company", "We", "Our", or "Us"). The definition "Us" should be interpreted as specified in the Terms of Use.

We develop and publish Family Locator: GPS Tracker ("App") for mobile devices.

When you use Platforms, 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 related to this Privacy Policy or our practices around privacy and data protection in

general, please don't hesitate to contact Us using Our contact details stated below.

BY USING THE PLATFORMS, YOU PROMISE US THAT YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY. If you do not agree or are unable to make this promise, you must not use the Platforms. In such case, you must (a) delete your account using the functionality found in "Profile" in the App, or contact us and request deletion of your data; (b) cancel any subscriptions use the functionality provided Google (if you are using Android) contact us by email at support@fmlyapp.com, and (c) delete the App from your devices.

COLLECTED INFORMATION

With regard to any information that relates to an identified or identifiable living individual ("personal data") We collect from you through our App, We are a data controller, and, regarding a part of personal data, data processor in the meaning as set out in the General Data Protection Regulation and other applicable data protection laws (the "Data Protection Laws").

When you visit our Platform, you may provide Us with the following types of data, and We may collect and process such data in accordance with this Privacy Policy, as follows:

Contact Data

This may include your name and your email address. This information will be collected by Us if you communicate with Us, for example, if you use the links on our Platforms to communicate with Us via email.

User's contacts data

This may include the user's contacts, a list of the user's contacts, and related data about the user's contacts. This data will be collected by Us, for example, to display the user's contact list.

Physical data

This may include your gender identity, in case such data is necessary to provide the App's functionality.

Account Data

If you create an account on our Platforms to benefit from our Platforms, you may need to provide your name, email address, phone number, and your photograph. If you use Facebook or Google to login to our Platforms, Facebook [or Google] will share data with us including but not limited to your profile data, language, location, and publicly available information about you and your friends.

Correspondence Data

This includes the information you provide when you request support through our Platform, contact Us via the email address provided in this Privacy Policy and elsewhere , and your views, opinions, and feedback that you choose to provide in relation to the Platform and Our subscriptions, including any comment facilities and message boards.

Session Data

This includes your IP address, your device's unique identifier details, browser details including version, device operating system, geo-location, time zone setting and time/date of access requests, the amount of data transmitted, and the requesting provider. We may also capture other information about visits to our Platform such as pages viewed and traffic patterns.

Cookie Data

Cookies are small files that are downloaded to your device when accessing our platform. Most web browsers automatically accept cookies. Please refer to "COOKIES AND TRACKERS" below for further details about our use of cookies.

Preference data

This includes any information you choose to provide Us.

Payment data

Our Platforms include purchases directly in the application (including subscriptions) and/or purchases directly.

INFORMATION WE USE BUT NOT COLLECT

Notwithstanding anything to the contrary in other Sections of this Privacy Policy in relation to the personal data, we do not:

- collect, store, share, or transfer the Face Data off your devices;
- use the Face Data to identify you;
- use the Face Data for authentication, advertising, or marketing purposes, or to otherwise target you in a similar manner;
- use the Face Data to build your profile, or otherwise attempt, facilitate, or encourage third parties to identify anonymous users or reconstruct user profiles based on the Face Data;
- transfer, share, sell, or otherwise provide the Face Data to advertising platforms, analytics providers, data brokers, information resellers or other such parties.

You hereby express your informed written consent to the processing of your Face Data as described in this Section (INFORMATION WE USE BUT NOT COLLECT) of the Privacy Policy.

HOW DO WE USE DATA?

When you use our Platforms, We may collect and process some of your personal data for different legitimate purposes. You will find below explanations regarding the reasons why We may collect data and the legal bases we rely on in each case.

Purpose:

- To respond to communications that you send to us;
- To market products and subscriptions to you;

- To enable you to personalize your use of Our App;
- To enable you to save and maintain your profile and administer your account with Us;
- To enable Us to identify you;
- To improve algorithms efficiency, accuracy and quality of suggestions related to face-scanning features to work;
- To correctly display the functionality of the App;
- To help address issues you raise with Us and to improve the Platforms and Our subscriptions;
- To administer, maintain and improve the Platform and our subscriptions, including identifying you or your device across Our Platform and App;
- To identify and respond to potential risks to the security of our Platforms (for example spammers, phishing attempts, screen scraping, and other actions which may violate Our Terms of Use);
- To infer your interests, including serving and suggesting content that you might like, and tailoring advertising to you based on such preferences;
- To operate and improve the App, and Platform;
- To customize your experience on the App, and Platform;
- To deliver communications that may be of interest to you, either electronically or otherwise;
- To enforce this Privacy Policy;
- To enforce terms and conditions (terms of use)/user's agreement;

- To conduct market analysis, traffic flow analysis, and related reporting to third parties;
- To provide reports based on information collected from use of Our App, and Platform;
- To keep you up to date on the latest App, and Platform announcements, software updates, software upgrades, system enhancements, special offers, and other information, provided that you can modify your marketing preferences;
- To provide support and assistance with Our App, and Platform;
- To provide you with shipping and billing information;
- To request your feedback;
- To provide information related to the use of the App, and Platform;
- To conduct questionnaires and surveys in order to provide better products and subscriptions to You. Your completion of any questionnaires is voluntary;
- Marketing purposes;
- For any other purposes disclosed to you at the time We collect your personal data.

DATA RETENTION

By using our Platform, you allow Us to store your personal data in line with legal, regulatory, financial, and good-practice requirements.

The period for which we may retain your personal data will depend on, including but not limited to: the type of

personal data collected, the purposes for which it was collected, the applicable statute of limitations for exercising legal rights. However, the period for which we may retain your personal data cannot exceed 12 (twelve) months from the date of account deactivation and/or deletion.

COOKIES AND TRACKERS

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

Strictly necessary cookies

These are cookies that are required for the operation of our Platform. They include, for example, cookies that enable you to load web pages.

Analytical/performance cookies

These cookies allow us to recognize and count the number of visitors to our Platform and to see how visitors move around our Platform. This helps us to improve the way our Platform 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 Platform. This enables us to personalize our content for you, greet you by name, and remember your

preferences (for example, your choice of language or region).

Tracking ID

Every Google Android device has a unique Tracking ID, called a Google Advertising ID (AAID). These Tracking IDs enable app providers and advertisers to track your activity and target ads.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

WHO DO WE SHARE YOUR DATA WITH?

We may need to share your personal data with selected third parties in the following circumstances:

Third-parties, including third-party service providers

This may include third parties who need to transfer your personal data to implement the functionality of the App (e.g. selling certain third-party products through/using the Apps); providers of certain systems and services that we use to host, administer and maintain our Platforms, including for example the servers used to host our Platforms, email service providers, payment processors, fraud prevention vendors, analytics, customer service providers and other service providers.

Third-party service providers for marketing purposes

If you explicitly consent to any marketing from us, certain personal data may be shared with third-party service providers we use to help us carry out marketing including, for example, third-party marketing automation platforms.

Compliance with Laws:

We may disclose your personal data to a third party if (a) We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process, or governmental request, (b) to enforce our agreements, policies and terms and conditions/user's agreement, (c) to protect the security or integrity of the Product, (d) to protect Our, Our customers or the public from harm or illegal activities, (e) to respond to an emergency which We believe in the good faith requires Us to disclose information to assist in preventing the death or serious bodily injury of any person.

Aggregated or Anonymized Data:

We may also share aggregated or anonymized information with third parties that do not directly identify you.

Group companies

Your personal data may be shared among affiliates and subsidiaries. In such cases, these companies must abide by our data privacy and security requirements

and are not allowed to use personal data they receive from us for any other purpose. We may also disclose personal data as part of a corporate transaction such as a merger or sale of assets.

Prospective buyers or sellers

If We, or Our owners, buys or sells any business or assets, We may disclose your personal data to the prospective buyer or seller of such business or assets. If We (or substantially all of Our assets) are acquired by a third party, your personal data held by Us, or within such assets, may be transferred to such third party.

By accessing or using App, and Platform, or otherwise providing information to Us, you consent to the processing and transfer of information in and to the U.S. and other countries and territories, which may have privacy laws different from your country of residence. Please note that some of the recipients of your personal data referenced above may be based in countries outside of the United Kingdom and European Union whose laws may not provide the same level of data protection. In such cases, we will ensure that there are adequate safeguards in place to protect your personal data that comply with our legal obligations. An adequate safeguard might be provided by signing a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission for transfers of personal data to third countries.

WHERE IS YOUR INFORMATION STORED?

We will store your data in the European Union where possible. We will do our best to keep this information secure. No information security system is perfect so please remember to be careful.

The personal data We hold will primarily be stored and processed in the European Union, but there may be circumstances where we need to work with trusted third parties outside of the EU in order to provide the products and subscriptions to you (e.g. where we run servers in the US). By submitting your personal data, you explicitly agree to such transfer, storing, or processing of data outside the EU. We will take all steps reasonably necessary to ensure that this information is treated securely and in accordance with this Privacy Policy.

All information We hold is stored on our secure servers (which we own or license from appropriate third parties). We use industry-standard procedures and security standards to prevent unauthorized access to Our servers.

HOW CAN YOU MANAGE (ACCESS, CORRECT, DELETE) YOUR DATA?

If you wish to access, correct, or update your personal data, you can do so at any time by contacting us via e-mail: support@fmlyapp.com.

If you would like Us to delete your information, you may: (1) send an e-mail to support@fmlyapp.com and place “Delete My Account” in the subject line, and/or (2) open “Profile” in the App, press “Delete account” button, tap “Delete” in pop-up, fill subscription field, and press “Continue” button. If you proceed with the deletion of your account, you will no longer have access to the account or subscriptions associated with your account. Other steps you should take should you wish to delete your account include disassociating your Facebook account from our applications, if applicable, and deleting the application(s) from your device (applicable only if the user has selected the option to create an account and login via Facebook). Please note that if you ask us to delete your account, all your progress in the application and any unused virtual items will be lost and we may not be able to restore them in the future.

THIRD-PARTY WEBSITES

Our Platform 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 personal data to those websites.

SECURITY

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.

We have put procedures in place to deal with any suspected data security breach and will notify you and the applicable regulator of a suspected breach where the breach may cause a risk to you.

Our security procedures mean that we may occasionally request proof of identity before We are able to disclose personal data to you.

Personal data you provide to us is protected by the password you create when registering to use the App, and Platform. Please understand that you can help prevent the unauthorized disclosure of information by choosing and protecting your password appropriately. You can also help prevent unauthorized disclosure by not sharing your password and preventing others from using your computer or mobile device.

We have implemented reasonable administrative, technical, and physical security measures to protect your personal data against unauthorized access, destruction, or alteration. For example:

- SSL encryption (HTTPS) everywhere where we deal with personal data.
- Databases encryption;
- Hosting data on physically secure servers that are also protected by firewalls.

We use commercially reasonable security procedures to protect all collected personal data. Please understand that no security system is perfect and, as such, we do not guarantee the security of th, or that your personal data won't be intercepted while being transmitted to us. If we learn of a security systems breach, then we may either post a notice or attempt to notify you by email. We will take reasonable steps to remedy the breach.

ACCESSING YOUR PERSONAL DATA AND YOUR RIGHTS

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

- Access: You can request to receive a copy of the personal data we hold about you.
- Rectification: If you believe that any personal data we are holding about you is incorrect or incomplete, you can request that we correct or supplement it. You can also correct some of this information directly from your account. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- Objection: You can contact us to inform Us that you object to the collection or use of your personal data for certain purposes.
- Erasure: You can request that we erase some or all of your personal data from our systems.
- Restriction of Processing: You can ask us to restrict or limit further processing of your personal data.

- **Portability:** You have the right to ask for a copy of your personal data in a machine-readable format. You can also request that we transmit the personal data to another entity where technically feasible.
- **Withdrawal of Consent:** If we are processing your personal data based on your consent (as indicated at the time of such data collection), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have then to provide express consent on a case-by-case basis for the use or disclosure of certain of your personal data, if such use or disclosure is necessary to enable you to utilize some or all of App, and Platform.
- **Right to File Complaint:** You have the right to lodge a complaint about our practices with respect to your personal data with the supervisory authority of your country.

To exercise your rights, please contact our data protection officer at support@fmlyapp.com or write to us at the address set forth in the “Contact” section.

OUR POLICIES CONCERNING CHILDREN

Our Platform is 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 Platform. Children should not use our Platform 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. If you believe that we might have information from or about a child, please contact us support@fmlyapp.com

CONTACT

You may contact Us at support@fmlyapp.com or the address below for further information.

CHANGES TO THIS PRIVACY POLICY

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you via electronic communications within our App. Please check back regularly to keep informed of updates or changes to this Privacy Policy.

