

PRIVACY POLICY

This Privacy Policy was last updated on: 2020.01.10

This Privacy Policy (hereinafter as the “Agreement” or “Policy”) applies to your use of this mobile application “Prookie” (hereinafter as the “App” or “Software” or “Services”) operated by Xingye (Hainan) Technology Co., Ltd (hereinafter as “we”, “our”, or “us”). We understand the importance of protecting your privacy. This Policy explains what information of yours will be collected when you download, install, access, or use the Software, and how such information will be used and shared. It also explains choices you have to control the collection, correction and/or deletion of such information. By using the Software, you consent to the Policy and to the collection, processing, disclosure and use of your information as described in this Policy.

1. Overview

This Policy applies only to information we collect in our App, e-mail and other electronic communications sent through or in connection with our App. This Policy DOES NOT apply to information collected by any third party. These third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

BY USING THE SERVICE, YOU HEREBY WARRANT AND REPRESENT THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, (II) YOU ARE OVER 16 YEARS OF AGE (OR ARE A PARENT OR GUARDIAN WITH SUCH AUTHORITY TO AGREE TO THIS PRIVACY POLICY FOR THE BENEFIT OF SUCH INDIVIDUAL UNDER 16 YEARS OF AGE).

IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN, PLEASE DO NOT USE THE SOFTWARE & SERVICES.

2. INFORMATION WE PROCESS AND PURPOSES OF PROCESSING YOUR INFORMATION.

2.1 Information we process

We may use Xcode API to collect certain technical information regarding your device: (i) Your configuration and settings of the Software and Services, version of the Software and Services; (ii) ISP (Internet Service Provider), Internet protocol (IP) address, anonymous user identifiers, device configuration and identifiers; (iii) Advertising ID.

We may use statistical code (such as AppsFlyer) provided by system to collect certain usage related information regarding your use and interaction with your device, including the Software and Services, such as when and how you use the Software and Services, for example, offerings and advertisements that you view, use and access, how you use them and your response to them, how frequently you use them, your search queries and the time and date of your searches.

We may use API provided by Apple to collect information about your subscription orders, such as purchase items, subscription time, order status, payment time. We do not collect and we are not responsible for the collection or security of payment details. Payment information is processed and

stored using third-party companies (such as Apple). These companies can be contacted through their websites: <https://www.apple.com>. Before entering your personal payment details, we suggest that you read and become familiar with the privacy policy of these third-party companies.

Camera and Photos. In order to use some of the features of the App, you may voluntarily grant us the permission to access to the camera or photo album to obtain photo in your mobile device. Only if you confirm the permission, will we gain access to your camera and album. Photos uploaded to the App and processed by the App are only stored in local, You may delete these photos by uninstalling the App whenever you like.

Facial Features Information. When you use certain face recognition functions including but not limited to using “Aging”, we will use sdk provided by third parties to analyze the facial features information on the facial photoes, automatically capture the position and shape of the five sense organs, process the facial photos, and feedback the effect drawing to you. For such photos, facial features information, we will neither store nor share them with any third parties after processing. We capture the facial features information only for operating the face recognition functions.

2.2 The purposes of processing your information

The main purpose we use your information is to deliver and improve the Service. Read on for a more detailed explanation of the various reasons we use your information:

to operate and update the Software and the Service, and provide you with existing and new functionality and features;

to improve and customize the Software and the Service;

to maintain, test, monitor and improve the quality and operation of the Software;

to take any action in case of a dispute involving you in connection with the Software and the Service;

If any new purposes for processing your information arise we will let you know we start to process information on that other purpose by introducing the corresponding changes to this Policy.

3.WITH WHOM WE SHARE YOUR PERSONAL DATA

We will only disclose your personal data with your knowledge and as stated in this Privacy Policy. This includes disclosures that will enable us to fulfill our obligations to you, and allows us to manage our business operations. Your personal data may be shared as follows:

3.1 We share your personal data with service providers

We will share your information with third parties only in the ways that are described in this Privacy Policy.

We will not rent or sell your personal data to third parties, but in order to help them and us understand the usage patterns of Service for analytical purposes and to offer new features or otherwise tailor or enhance our Service, we may share your information with third parties that

provide automatic data processing technologies for the App or providing service to the App. We do not have power to control or influence these third parties' tracking technologies or how they may be used. Therefore, if you do not want to share your personal data with any third-party organizations, please contact us by email for more details or do not use such service provided by that third party.

3.2 We may share your personal data for safety, legal purposes and law enforcement

We use and disclose personal data as we believe necessary under applicable law, to enforce our Terms of Service, to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

3.3 We may share your personal data with third parties in case of change of control

As we develop our business, we may buy or sell assets or business offerings. Customer information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

4. PRIVACY RIGHTS

If you reside in the EU, you may:

Delete your personal data: You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Service to you) by sending us an email.

When you request to delete your personal data, we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such data and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements, please check section 8 for more details). When we delete any data, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud detection or similar purposes.

Change or correct your personal data: You can edit, change, update or fix some of your personal data by sending us an email.

Object to, or limit, or restrict, use of your personal data: You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held) by sending us an email.

Access your personal data: You can ask us for a copy of your personal data by sending us an email. You can ask us for a copy of your personal data in machine readable form by sending us an email.

5.PROTECTION OF PERSONAL DATA

We take precautions — including administrative, technical, and physical measures — to safeguard your personal data against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. We use firewalls, encryption technology and Network access designed to protect against fraud and identity theft; our data is only stored in centers that provide high-level security for user's data. We also protect user's privacy by seeking to minimize the amount of sensitive data. We also seek appropriate contractual protection from our partners regarding their treatment of user data. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

6.CHILDREN'S PRIVACY

Although our Service is a general audience service, our App is not intended for children under the age of 16 or other statutory minimum age according to the applicable laws and regulations in your country (the "Minimum Age") . We do not knowingly collect, maintain, or use personal data from children under the Minimum Age, and no part of the Service is directed to children under the Minimum Age. If you learn that your child has provided us with personal data without your consent, you may alert us at prookiehelp@gmail.com. If we learn that we have collected any personal data from children under the Minimum Age, we will promptly take steps to delete such information and terminate the Service for the child.

7.CHANGES TO THIS PRIVACY POLICY

We may modify this Agreement at any time. If we decide to make material changes to this Agreement, we will provide notice through our Service, or by other means, to provide you an opportunity to revise changes before they become effective. If you disagree with the changes to this Agreement, you should stop using Service. Your continued use of our Service after we send a notice about our changes to this Agreement means that you are consenting to the updated Agreement.

8.DATA RETENTION

We retain your personal data we collect as described in this Agreement and for as necessary for the provision of the Services, internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements (e.g. settlement). The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the Services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

9.CONTACT US

You may contact us at any time for details regarding this Agreement. For any questions concerning your personal data please contact us at prookiehelp@gmail.com.

This Privacy Policy is effective upon acceptance by users or publication by us once update or modification. This Privacy Policy is incorporated into, and is subject to the Terms of Service.