Privacy Policy

1. THE FOREWORD.

This Privacy Policy (hereinafter the "Policy") is meant to inform you, as a user of this Application (hereinafter the "Application") the following:

What personal data are collected from you when you use this Application;

The purposes of the processing of your personal data and the legal bases for this processing;

The list of the recipients of your personal data, collected from you when you use the Application;

The information about the transfer of your personal data outside the European Union;

The list of the rights that you may apply within the processing of your personal data;

Other issues that may be necessary within the processing of your personal data.

If you have any questions about this Policy or about the processing of your personal data by the Application, please, do not hesitate to contact Us via e-mail address: leoniemarchiel@lerokterr.com

2. PROCESSING OF YOUR PERSONAL DATA.

Under article 4(1) of the Regulation 2016/679 of the European Union and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "General Data Protection Regulation" or "GDPR"), means " For the purposes of this Policy, the personal data hereinafter shall be referred to as the "data".

When you use the Application, the following data are collected from you:

2.1 THE DATA, COLLECTED BY THIRD-PARTY SDK.

"SDK" means "software development kit" - the tools, provided by third parties, which are integral parts of this Application. Below you can find the list of SDKs integrated into this Application, what data from you they collect and why do We use a particular SDK.

2.1.1 FACEBOOK SDK.

We use the SDK, provided by Facebook Inc., 1601 Willow Road Menlo Park, CA 94025, USA. This SDK collects the following data:

Automatically logged events - basic interactions in the Application (e.g. application installs, application launches) and system events (e.g. SDK loading, SDK performance) that are collected automatically;

Facebook app ID;

Apple Identifier for Advertisers (IDFA);

Metadata from the request - the mobile OS type and version, the device opt-out setting, your agent string and your IP address;

Your device metrics: time zone, device OS, device model, information about your carrier, screen size, processor cores, total disk space, remaining disk space;

Explicit events configured by Us (if applicable);

Implicit events as offered by Facebook SDK, such as integration with Facebook Login or the "Like" button (if applicable).

The Purpose of usage of Facebook SDK - We use Facebook SDK to tailor our Facebook advertising campaigns and to show our advertising materials to more relevant users.

Legal bases for this processing:

Article 6(1)(a) of the GDPR - you have given consent to the processing of your personal data for the purposes of this Policy;

Article 6(1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by Us.

To find out more, please, follow https://www.facebook.com/privacy/explanation.

2.1.2 ADJUST SDK.

We use the SDK, provided by Adjust GmbH, Saarbrücker Str. 37a, 10405 Berlin, Germany. This SDK collects the following data:

Your hashed IP address;

Your Apple Identifier for Advertisers (IDFA);

Information about the installation and the first opening of the Application on your mobile device;

Your interactions within the Application;

Information regarding which advertisements you have seen or clicked on (if applicable).

The Purpose of usage of Adjust SDK - We use Adjust SDK for the following purposes:

To track your behavior within the Application;

To track our marketing performance. For example, We may track the source, from which you have visited or downloaded this Application;

To understand how do you engage with our Application. We use Adjust SDK to track your interactions within the Application in real-time in order to see how you engage with our Application within its full lifetime.

To find out more, please, follow https://www.adjust.com/terms/privacy-policy/.

Legal bases for this processing:

Article 6(1)(a) of the GDPR - you have given consent to the processing of your personal data for the purposes of this Policy;

Article 6(1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by Us.

2.1.3 APPODEAL SDK.

We use the SDK, provided by Appodeal, Inc., 350 Alabama Street Unit 10, San Francisco, CA 94110. This SDK collects the following data:

Your IP address;

Your Apple Identifier for Advertisers (IDFA);

GPS location (if applicable and only if you permit access to your geolocation to this Application);

Application usage statistics such as launch times and duration, advertisement views, and click-throughs.

The Purpose of usage of Appodeal SDK - We use Appodeal SDK for the following purposes:

To show you advertising materials, that fit your interests and preferences;

To develop and/or enhance our marketing campaigns and the Application itself.

To find out more, please, follow.

Legal bases for this processing:
https://www.appodeal.com/home/privacy-policy/

Article 6(1)(a) of the GDPR - you have given consent to the processing of your personal data for the purposes of this Policy;

Article 6(1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by Us.

2.1.4 ONESIGNAL SDK.

We use the SDK, provided by OneSignal., a U.S. company located at 2850 S Delaware St Suite 201, San Mateo, CA 94403. This SDK collects the following data:

Information about your interactions with this Application;

Your IP address, the information about your geographic location and system configuration information;

Your Apple Identifier for Advertisers (IDFA);

Precise Location information, generally your lat/long data (i.e., GPS-level data) or WiFi information, which we may associate with Mobile IDs, and which may be collected whether or not the Application is in use;

Your e-mail address (if applicable);

What push notifications to you have been sent;

Information about your device type, type and version of operating system, network provider; mobile browser (e.g. Safari, Chrome, etc.), language setting; time zone setting; and network status type (such as WiFi).

The Purpose of usage of OneSignal SDK - We use OneSignal SDK in order to:

Send you "Push notifications".

Legal bases for this processing:

Article 6(1)(a) of the GDPR - you have given consent to the processing of your personal data for the purposes of this Policy;

Article 6(1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by Us.

To find out more, please, follow https://onesignal.com/privacy_policy.

2.2 THE DATA YOU PROVIDE TO US.

Message data. When you contact Us via e-mail address leoniemarchiel@lerokterr.com or via available means of communications, you may provide Us the information, that may fall within the definition of "personal data" under the GDPR:

Your email address and other contact details that may be provided;

Your name;

The subject of your message (including all the information contained in it).

The purposes of the processing:

Your Message data will be used solely for the purposes of your message. Examples include, but not limited to the following:

If you make a request - We will use your Message data in order to respond to your request;

If your message contains a business proposal - We will use your Message data in order to contact you to discuss potential business relationships.

Legal bases for this processing:

Article 6(1)(a) of the GDPR - you have given consent to the processing of your personal data for the purposes of this Policy;

Article 6(1)(b) of the GDPR - processing is necessary for the performance of a contract to which you are a party or in order to take steps prior to entering into a contract with you;

Article 6(1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by Us.

2.3 HOW ELSE CAN WE USE YOUR DATA?

To develop this Application. Your data may be used for the following purposes:

Diagnose any problems within the Application;

Protect our Application from any attacks (including hackers attacks);

To develop our Application - create new functions and enhance existent ones;

Additionally, we may anonymize your data and use these data for research and analysis. For example, to find out how people of the different audiences use our Application. This will help Us to make our Application more useful and convenient for all the users.

Legal basis for this processing:

Article 6(1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by Us.

To comply with the applicable legislation. We may use your data in order to comply with a legal obligation to which We are subject.

Legal basis for this processing:

Article 6(1)(c) of the GDPR - processing is necessary for compliance with a legal obligation to which We are subject.

2.4 WHO ELSE CAN WE DISCLOSE YOUR DATA.

In addition to the providers of SDK, specified herein, your personal may be disclosed to the following recipients:

Our employees and employees of our affiliated companies. Our Application is developed and maintained by many people, including our employees and employees of our affiliated companies. Thus, your data may become available to them. Please note, that all these employees have signed proper agreements, that will oblige them to handle your data in strict compliance with this Policy.

Governmental authorities. We may share the data, collected from you, with the authorities of the country of our incorporation, or with authorities of your jurisdiction if We are/will be obliged to do this under the applicable legislation.

3. HOW LONG SHALL WE STORE YOUR DATA?

We shall store your data for so long as is necessary for the purposes for which your data was collected. If applicable legislation may require an additional storage period, this information shall be published in revised version of this Policy or notified to you (if applicable).

4. YOUR RIGHTS UNDER THIS POLICY.

Under the applicable data protection legislation, you have a number of rights, that you may apply by sending a request to leoniemarchiel@lerokterr.com

These rights are the following:

The right to access. You have the right to obtain from Us confirmation as to whether or not personal data concerning you are being processed, and, if We indeed process your personal data, to receive a copy of the personal data undergoing processing.

The right to rectification. You have the right to obtain from Us the rectification of inaccurate personal data concerning you (if applicable).

The right to erasure ("the right to be forgotten"). You have the right to have your personal data removed. This right shall be applied if: i) your personal data are no longer needed for the purposes, for which these data were collected; and ii) We do not need your personal data for the purposes of compliance with applicable legislation.

The right to object to processing. You have the right to object, on grounds relating to your particular situation, to processing of your personal data, if the grounds of this processing were necessary for the purposes of the legitimate interests pursued by Us. Additionally, you have the right to object to the processing of your personal data for direct marketing purposes (if applicable).

The right to restriction of the processing. You have the right to obtain from Us the restriction of the processing of your personal data, in case if one of the following applies: a) you contested to the accuracy of the personal data - for a period enabling Us to verify the accuracy of the personal data; b) the processing is unlawful and you oppose the erasure of the

personal data and requests the restriction of their use instead; c) We no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; d) you have objected to processing on the basis of your right to object pending to verification whether your legitimate grounds override those of Us.

The right to withdraw consent. If you previously consented to the processing of your data, you have the right to withdraw this consent at any time. It means that We shall stop processing of the personal data, for the processing of which the consent was required, starting from the date of the withdrawal. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

The right to data portability. You have the right to receive from Us the data, which were collected from you, in a structured, machine-readable format and have the right to transmit those data to another controller (simply, to another company). Nevertheless, this right applies only to the processing, which was carried out by automatic means.

Please note, that these rights are applicable with some restrictions:

If We are not sure about the identity of the requestor, We may verify the identity of a user/visitor who requests for the realization of any of the rights prior to the implementation of this right.

We may restrict the rights, specified above, or deny in realization of any of the rights, if this restriction or denial is grounded on the legislation, to which We are subject. In this case, We will specify to you the reason for the denial in the reply to your request.

The right to lodge a complaint with a supervisory authority. You can always contact Us for any issue concerning the processing of your personal data, including complaints. Nevertheless, if you deem, that your rights under the applicable data protection legislation have been infringed, you can lodge a complaint with the personal data protection authority of your jurisdiction. You can find the list of all EU data protection authorities on the website of the European Data Protection Board: https://edpb.europa.eu/about-edpb/board/members_en.

5. PROCESSING OF CHILDREN`S DATA.

We do not knowingly process the data of individuals younger than eighteen (18) years old. If you are a parent or a guardian

and you are aware that your child has provided Us with his/her data, please contact Us so that we will be able to take the necessary actions.

6. DATA TRANSFER OUTSIDE THE EU.

Our business is global, and some of our employees, affiliates and contractors may be located, incorporated and established in the jurisdictions outside the European Union. In some cases, these countries may not be recognized by the European Commission as the countries, that offers an adequate level of data protection. We warrant, that all our non-EU employees, affiliates and contractors have signed with Us proper Data Transfer Agreements, which obliges these employees, affiliates and contractors to process your data in accordance with this Policy. By agreeing to this Policy, you hereby agree to these transfers.

7. LINKS TO THE THIRD-PARTY SERVICES.

There are several places on our Application where you may click on a link directing you away from our Application to access other applications, websites or services that do not operate under this Policy (hereinafter "third-party services"). These third-party services may independently solicit and collect information, including personal data, from you and, in some

instances, provide Us with information about your activities on those third-party services. We bear no liability for any outcome of your use of these services. We recommend you to inspect the privacy statements of all third-party services you visit by clicking on the "privacy" document prior to giving any data to these services.

8. CHANGES TO THIS POLICY.

We may change, amend or modify this Policy from time to time. If We do this, We will let you know by revising this Policy. By continuing to use our Application after Policy changes go into effect, you agree to be bound by the revised version of the documents.