

## **Privacy Policy**

This Privacy Policy (“Privacy Policy”) is a legal agreement between you (“you”, “your”) and Impact Innovations Institute limited liability company, its licensors, agents (“we”, “us” or “our”) for use of “Safe YOU” mobile application (“App”), the website, the services provided through the App and all related features and content provided by us (collectively “Service(s)”).

You are hereby notified that for the purposes of Services provision we have to collect and process certain personal data (“Data”) related to you or your device(s).

By creating an account or accessing or using the App, you provide your explicit consent to collection and processing of the data in accordance with this Privacy Policy. IF YOU DO NOT AGREE TO THE TERMS CONTAINED HEREIN YOU MAY NOT ACCESS OR USE THE APP.

All those subject to this Privacy Policy are referred to as “Users” for purposes of this Privacy Policy.

### **Types of Data collected**

Among the types of Personal Data that the App collects, by itself or through third parties, there are: Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), your first name, your last name, date of birth, marital status, phone number, e-mail address, location, Device & app history.

Additionally, depending on the User's specific device, the App may request certain permissions that allow it to access the User's device Data. For example, the App will ask you to grant permission to record audio, this will let the App automatically record audio when you press and hold the help button and send an emergency sms to your chosen contacts. Also, the app will ask a permission to access your contacts list so that you can import emergency contacts into the App’s support section.

By default, all permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact us for support by contact details provided in the present document.

Please note that the revoking of such permissions might impact the proper functioning of Service and may even make it impossible for the App to function on your device.

**Location Information:** When you start using the App the location services of your phone should be enabled. The Help Service cannot be used without switching on location. We collect your location information to be able to send to your emergency and support contacts your location when you press the Help button in emergency situations.

When you press the Help button in our App the emergency contacts, support contacts chosen by you and/or police (if this function is enabled by you) will receive a sms containing the address of your location and a link to the map with a tag on your location.

Device Information: We may collect information about Users mobile device, including, for example, the hardware model, operating system and version, preferred language, and mobile network information.

Usage Information: In order to improve Service platform, we automatically receive information about User's interactions, the actions within the App.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Service.

Unless specified otherwise, all Data requested by Service is mandatory and failure to provide this Data may make it impossible for us to provide Services. In cases where Service specifically states that some Data is not mandatory, Users are free not to communicate this Data.

Additionally, while using our Services you may provide us data on your personal life, such as related to your health, to your family, to your physical and physiological wellbeing etc. Please be aware that the information you share through our forums with other users is shared under your nickname, thereby you can always choose a random nickname to hide your real name and surname from other users or professionals who have access to discussions in our forums.

Purpose of collection and processing of the Data

We may use your Personal Data for the following purposes:

- To provide you security services of the App;
- to analyze, operate, maintain and improve the App, to add new features and services to the App, to support the existing functions of the App;
- to customize content and materials you see when you use the App;
- to customize product and service offerings and recommendations to you, including third party offerings;
- to verify your identity when it is required by law;
- to send you technical notices, updates, security alerts and support and administrative messages;
- for any other purposes disclosed to you at the time we collect Personal Data or any other purposes indicated in this Privacy Policy.

Mode and place of processing the Data

Methods of processing

We take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. Besides us, in some

cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Service (administration, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by us. By accessing the App you give your explicit consent for processing of your Personal Data by all parties in charge, as well as for transfer of your Personal Data abroad in cases of necessity. You may be confident that any person in charge that might receive access to your Personal Data exclusively for the purpose of performing his/her duties, shall be bound by the non disclosure agreement of any Personal Data received for the performance of such duties.

By default, we do not share any of your Personal data which anyhow identifies you with any of our network member NGO's, professionals or State Authorities. We may only share your Personal Data to provide you security Services when you choose to press the Help button in our App.

Additionally, we may also share impersonalized (meta) information with service providers who need access to such information to carry out work on our behalf, with third party or organizations, who provide services or promotions which can be interesting for you.

In case of using Personal Data of third parties you hereby shall ensure the obtainment of any required consents and permissions from those parties. You hereby undertake to keep the App and its staff harmless of any claims for non-authorized usage/processing of Personal Data of third parties that has been used by you in your publications. You are responsible for any third-party Personal Data obtained, published or shared through Service and confirm that you have the third party's consent to provide the Data to us.

You are also responsible for sharing your Personal Data with any third party listed in App's Network section, whom you have separately contacted. Please make sure to learn their privacy policies before providing them with any Personal Data.

### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Personal Data collected for the purposes of our legitimate interests shall be retained as long as needed to fulfill such purposes. You may find specific information regarding the legitimate interests pursued by us within the relevant sections of this document, in our terms of use or by contacting us.

We may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn through the written request as stipulated

below. Furthermore, we may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### **Account deletion and erasure of personal data**

You are entitled to request us to delete your account and erase any personal data we hold about you by sending a written request to the email address: [info@safeyou.space](mailto:info@safeyou.space) .

We will do our best to process your request and in any event within one month of the receipt :

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request, whichever happens to be later.

Given the sensitive nature of erasing personal data, we require certain conditions to be met before a request may be considered. Please supply us with the reason you wish your data to be erased and please attach any justifying documents to your request.

Please indicate in your request any of the reason cited below which justifies your request:

- You feel your personal data is no longer necessary for the purposes for which we originally collected it.
- You no longer consent to our processing of your personal data.
- You object to our processing of your personal data as is your right under Article 21 of the GDPR.
- You feel your personal data has been unlawfully processed.
- You feel we are subject to a legal obligation that requires the erasure of your personal data.
- You are a child, you represent a child, or you were a child at the time of the data processing and you feel your personal data was used to offer you information society services.

To be able to verify it, please also indicate your user ID (available in your profile section), your phone number and nickname.

Please note that. In certain circumstances, where erasure would adversely affect the freedom of expression, contradict a legal obligation, act against the public interest in the area of public health, act against the public interest in the area of scientific or historical research, or prohibit the establishment of a legal defense or exercise of other legal claims, we may not be able to erase the information you requested in accordance with article 17(3) of the GDPR. In such cases you will be informed promptly and given full reasons for that decision.

### **Governing Law**

This Privacy Policy shall be governed and construed in accordance with the laws of the Republic of Armenia, without regard to its conflict of law provisions.

Our failure to enforce any right or provision of this Privacy Policy will not be considered a waiver of those rights. If any provision of this Privacy Policy is held to be invalid or unenforceable by a

court, the remaining provisions of this Privacy Policy will remain in effect. This Privacy Policy constitutes the entire agreement between us regarding our Service and supersedes and replaces any prior agreements we might have had between us regarding the Service.

### **Changes**

We reserve the right, at our sole discretion, to modify or replace this Privacy Policy at any time. Some jurisdictions do not permit unilateral updates or changes to consumer terms, so this paragraph may not apply to you. If a material change is made, we will post a notice. Read through any changes, and if you do not agree to them, please stop using the Service. If you continue to use the Service after we notify you of changes, you will be deemed to have accepted the updated Privacy Policy, except to the extent prohibited by applicable law.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at [info@safeyou.space](mailto:info@safeyou.space) .