

## **Secured VPN by C-Punks Privacy Policy**

### **Overview**

Secured VPN by C-Punks (also referred to as “we”, “us” or “our”) understands that you are aware of and care about your personal privacy interests, and we take that seriously. We will fully comply with all applicable Data Protection legislation from time to time in place. This Privacy Policy describes Secured VPN by C-Punks policies and practices regarding its collection and use of your Personal Information, and which rights you have regarding them.

We understand that users may have some concerns with regards to privacy policy. Below we have provided detailed information with respect to the download, installation and use of Secured VPN by C-Punks

When it comes to the download, installation and the actual use of this application, you are expected to agree with the terms and conditions of the policies provided as well as any changes that may be made in the future. If you do not agree with the terms and conditions of the policies provided, please refrain from using this application.

### **Security terms**

When users use the application on encrypts all the traffic information that will be exchanged between the user's domain and Secured VPN by C-Punks servers will use TLS 1.2 along with outstanding level of secrecy (ECDHE) as well as in terms of encryption 128-bit/256-bitAES data will apply, along with HMAC identification for messaging will be provided.

Generally, whenever users use public wireless service including airports, restaurants, hotels, train stations etc., to connect to the application, we guarantee that received signal will be protected by Secured VPN by C-Punks While you use the application, there is one hundred percent guaranty that nobody, including internet provider will be able to hack or snoop into the traffic you use as well as the webpages you need to open. Whoever makes an attempt to hack and watch what you are up to will only be able to see that the traffic is going in and out of your device but the details will never be seen.

The service ensures physical, administrative and technical safety, so that no sensitive and private information is leaked. Maximum protection is ensured to restrict unlawful access, collection, maintenance as well as distribution of your personal information and data.

### **Personal Information**

What private data do we collected?

In this context “Personal Information” means information and data that belongs to an identifiable or unidentifiable person. Personal information will be collected from different sources as listed below.

At every point where user personal information is required, users will be duly notified. Upon the issuance of such notification, you may choose not to provide your personal data; however you may be foreclosed from the use of some of the features that are provided by the application, if such information is compulsory in relation to these features.

We guarantee that personal information that includes IP address, email address; mobile identification etc. will never be associated with your online activities. Moreover, when the service is activated, the IP address that you use will be securely encrypted for the whole length of use

of the service and will be deleted from your device afterwards when you no longer use VPN service.

### **Personal Information Provided on the Basis of User's Choice**

When you decide to subscribe to our service, we always have to collect some information that you may volunteer to share with our services. For instance, when you make first subscription to our service and choose the premium package, we may require that you provide us with email address as well as payment details. It always has to be remembered that signing in the service and opening an account is not an obligation, which means that you are not obliged to register or supply any details with relation to the account in order to make the downloads and actual use of the service.

Please take note that payment details are obtained by third party services and not us. All payments made via the use of Apple Store or Google store as well as PayPal will be subject to the terms and conditions of the system where those payment details will be supplied. It will have nothing whatsoever to do with our service and will relate to the Privacy Policy of any of the above mentioned organizations.

In the event that you make a contact to our services directly, some additional detail may be collected with your permission. For instance, if customer care department is contacted, you may be asked to provide the content for attachments and messaging you are about to send as well as some additional details may be asked too.

### **Automatically Collected Personal Information**

When you establish a connection to Secured VPN by C-Punks or make a download as well as access the official website, some information is going to be collected automatically. It is going to be done by us and our third party partners.

Once the service is launched, we collect information about the device that you use. It includes the network that you use, your language, the identification of the mobile device, version of operating system as well as hardware. We will also need to know your rough location; hence some information about your IP address will also be collected. This is done for the reasons of making in depth analysis, make improvements for our services and to do troubleshooting. Parties that specialize in service improvement for us may require such details to be collected for marketing purposes.

When connection to our service is established and when it comes to the stage when IP address details are collected, it immediately becomes encrypted and remained so until the VPN session comes to an end. The IP address that any user uses will be deleted immediately after the session and the use of the service is finished and you are disconnected. After disconnecting from the service we will never keep your IP address in our history or log into the system under the IP number that you used. Your IP address is not regarded to be as part of your online activities by any means.

Whatever application or website is used by a user, it is never attributed with a concrete user. Your activities stay intact and apps or domains that are used will not be associated with your gadget, email and even yourself. Websites accessed with the use of our service are stored for the following: 1. For making analysis, in order to find out whether users can easily access certain applications and websites. 2. Provided services' quality has to be improved as well as any problems and troubles will have to be eliminated.

### **When the Service's Websites are Accessed:**

Together with our partners, (Maxmind or even Google analytics) we could collect your details and information automatically. It is usually obtained by placing beacons, cookies or perhaps by making applications of other similar technologies in browser that users use or with the emails that are sent to you. It could be done for the purposes of preventing fraud, determine the overall number of website users, to make sure the site operates and functions in the most efficient way as well as for newsletter and other messages. If any user does not want such information to be collected via the use of cookies, there is a standard procedure in any browser to disallow this information to be collected. Cookies settings could be made so that any particular site would be declined or accepted to use your browser cookies. Please bear in mind that if your browser will decline the use of cookies for our service, some difficulties may be experienced when official website is used.

When you access the service's website your IP address may be collected immediately, however it will not be stored anywhere. The address can be used with intention to determine your rough location in a city. More importantly the details that are received will be deleted immediately when you leave the website. The section that is branded "When you use Secured VPN by C-Punks will tell you in more details of how IP address is treated when you subscribe to our service and products as well as when you use it.

Additionally when users access the website of the application, some information with regards to the details of your device might be collected too. The intention of collecting such information are based on the fact that we will require carrying out troubleshooting activities, make website improvements as well as our analytical team will have to analyze all collected data. The following aspects may be subject to the data collection: network that you use, your language, the identification of the mobile device, version of operating system as well as hardware.

For the purposes of general service usage, obtaining trends knowledge and information on reports and activities, our website uses the technologies and cookies of Google Tag Manager and the software of Google Analytics. When you establish a connection to our service and products, the information details that will be collected are not going to be associated with the usage of such connections.

### **How We Intend to Use Personal Information**

To be precise, whatever personal information we obtain from users are used for the purposes of improving the quality of our services and offers you wonderful range of products. Below are some examples:

Each of our users is provided with immediate response from our high quality customer services team, information and instant comments are offered at any time whereas the services require maintenance, outstanding operations enhancement and offering users with great features.

Every aspect of the services provided as well as features and newly developed products must have outstanding functionality whereas correct perception of trends is highly important.

We also practice frequent contact with each of our registered users in order to keep the quality of our services at the top level. The contact are made purely for administrative purposes

and for the purpose of providing users with newly released information with regard to changes in terms and conditions as well as policies in general.

The contact can also be made due to marketing programs enhancement and implementing certain complains attribution.

There are a number of other purposes that are associated with our business needs such as preventing frauds, establishing higher levels of security and making audits.

To make sure the legal rights of both parties are followed as well as terms and conditions of service are implemented in the right way.

If you are a current resident of geographical and economic Europe, personal Information that you provide to us will be processed purely in accordance with the European legislation, which will include the following;

Personal Information provided is subject to some legal obligation that we implemented in the following policy terms and conditions:

Whatever it is either for us or any of our third party partners the legitimate background foundation does exist. Especially, when Personal Information is the subject and the foundation of lawful interest to solve some crucial issues that may include the following: our services performance development, acquire new users and incorporated bodies, conducting and improving safety aspects, business analysis are carried out, general advertising issues have to be solved, making improvements to range of products that we provide to our users and troubleshooting. When Personal Information is provided it has to be always relied on our third parties partners' lawful interests and when this legitimate interest does not interfere and breach the interest of individuals who use our services

#### **How Such Information is shared with others?**

Users' Personal Information can only be shared right in accordance with the terms and conditions that relates only to services quality improvements, in case if our business is sold to someone else or merged with other enterprise, or any other aspects that are allowed by the law. As it has been stated before, we never log into your activities and your IP is erased immediately when you are disconnected from our VPN service. Below we provide broader look and far more comprehensive details who we share information with and why it is done:

It is shared with our third party partners who enable services to work and perform well. The bodies, which provide technology and information for this technology, infrastructure network provision, accept and process payments, contribute to customer care, involved in advertising activities, contribute to preventing frauds, analyze information and various data etc.

When the service is launched and you start to use it, we may obtain your IP details information to find out the rough location of our user, whereas the obtained details are erased immediately when a user is disconnected from VPN. When connection to our services is established non bodies whose advertisements you might see will be able to get your Personal Information as well as to see your IP address, however derived location in the city may be visible. If a customer uses premium level services even derived rough location will not be seen and obtained by any third party partner.

The information will be passed to a third party who may be involved in acquisition of our business, participating in merger with our company, creating loin venture, when purchasing

certain part of our business obtaining certain amount of stock and assets or becomes an owner of such assets due to bankruptcy.

No general contact information will ever have to be provided if you only would like to download the application as well as to use the company's products and services, customers' VPN is never kept in our files and not used to be logged into the system after you disconnect and do not use the service any longer, no records of our customers' online activities are kept. Consequently, there is no information about our customers that can be kept in general and that can be provided on law enforcement requests as well as to share with any party when such requests are made.

Despite the above mentioned fact, we still may share the information that we already have if we are obliged to do so by the law or otherwise if there is a genuine belief that such actions will be appropriate:

A. To totally comply with an act with legal procedures.

B. When we will be required to respond to queries and requests from government and public authorities including outside of your current residence.

C. When the current legislation can be applied including legislation from places outside your current residence.

D. When our users rights, possessions and property will have to be protected well.

E. When policy's terms and conditions will have to be followed.

F. When our service's operations will require certain protection.

G. When our company will need to apply and maintain methods of solving things as well as to prevent any damage that may be caused to us.

If you are subscribed to the use of the Premium package, then no single piece of information will be shared with advertisers

Any information can be shared with third parties in general on condition that a customer is not identified and if it is allowed to do so by current legislation and if such action does not breach the law.

### **Purchases**

Generally. From time to time, Secured VPN by C-Punks may offer products and services for purchase ("in app purchases") through iTunes. If you choose to make an in app purchase, you will be prompted to confirm your purchase with iTunes, will be charged for the in app purchase at the prices displayed to you for the service(s) you've selected as well as any sales or similar taxes that may be imposed on your payments, and you authorize Secured VPN by C-Punks, as applicable, to charge you. If you purchase an auto-recurring periodic subscription through an in app purchase, your IAP Account will continue to be billed for the subscription until you cancel. After your initial subscription commitment period, and again after any subsequent subscription period, your subscription will automatically continue for an additional equivalent period, at the price you agreed to when subscribing.

### **Auto-Renewal; Automatic Payment**

Subscriptions are automatically renewed, until you terminate or cancel the subscription. When you purchase a subscription, your iTunes account will continue to be billed monthly in advance within 24 hours of the date of the initial purchase at the price you agreed to when initially subscribing.

After each payment you will receive a receipt by email. Objections to a payment already made, should be directed to Customer support if you were billed directly by Secured VPN by C-Punks or the relevant third party account such as iTunes. You are also be able to object by contacting your bank or payment provider, who can provide further information on your rights as well as applicable time limits.

You may unconditionally withdraw your consent to automatic payments at any time by going to settings on Secured VPN by C-Punks or the relevant third party account, but be advised that you are still obligated to pay any outstanding amounts.

### **Refunds**

Generally, all charges for purchases are nonrefundable, and there are no refunds or credits for partially used periods.

For subscribers residing in the EU or European Economic Area, in accordance with local law, you are entitled to a full refund without stating the reason during the 14 days after the subscription begins. Please note that this 14-day period commences when the subscription starts.

### **Changes and Amendments to the Privacy Policy**

We have the right to make changes to the privacy policy and terms and conditions at any period of time and with any frequency. Users are expected to familiarize themselves with the changes that can be made from time to time. The company will take all the appropriate actions to keep its users aware of the changes that are made.

### **Enforcement**

If for any reason you believe that Secured VPN by C-Punks has not complied with this privacy policy, please notify us by email, and we will do our best to determine and correct the problem promptly. Be certain that the words Privacy Policy are in the Subject line.

### **Legitimate Interest**

Secured VPN by C-Punks will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Secured VPN by C-Punks or the application (b) protect and defend the rights or property of Secured VPN by C-Punks and its family of application, and (c) act in urgent circumstances to protect the personal safety of users of Secured VPN by C-Punks its application, or the public.

### **Data Storage and Retention**

Your personal data is stored and processed for as long as it is necessary from the date of your registration, after that it will be deleted. Note that we may process your personal data for an extended period of time if it is necessary in order to comply with a legal obligation.

### **Links to Third Party Site**

The links in this area will let you leave Secured VPN by C-Punks The linked sites are not under the control of Secured VPN by C-Punks and Secured VPN by C-Punks is not responsible for the contents of any linked site or any link contained in any linked site, or any changes or updates to such sites. Secured VPN by C-Punks is not responsible for webcasting or any other form of transmission received from such linked site. Secured VPN by C-Punks is providing these links to you only as a convenience, and the inclusion of any link does not imply endorsement by Secured VPN by C-Punks of the site.

### **Data Subject Rights**

By virtue of the General Data Protection Regulation (GDPR) our website users have, with certain statutory exceptions, multiple rights with regard to Secured VPN by C-Punks processing of personal data. Users have:

- (1) the right to request access to their personal data and to find out how they are processed;
- (2) the right to correct or complete incorrect or incomplete information;
- (3) the right to delete personal data for data processed illegally where the lawful basis is consent;
- (4) the right to restrict personal data processing;
- (5) the right to transfer personal data in electronic format (data portability);
- (6) the right to object to personal data processing based on the legitimate interest of Secured VPN by C-Punks

Users have the right at any time to withdraw consent previously given regarding Secured VPN by C-Punks processing of users personal data.

### **Agreement and Litigation**

By using Secured VPN by C-Punks application and our services you agree to the terms and conditions contained in this Privacy Policy and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use Secured VPN by C-Punks. You agree that any dispute over privacy or the terms contained in this Privacy Policy, or any other agreement we have with you, will be governed by the laws of Secured VPN by C-Punks. You also agree to arbitrate such disputes in Secured VPN by C-Punks and to abide by any limitation on damages contained in any agreement we may have with you.

### **Contact details**

If a user has any questions or queries regarding the policy, the contact should be made in writing on the following email address: Secured VPN by C-Punks