

# Privacy Policy

## 1. INTRODUCTION

Leo Dinan (“we,” “us” or “our”) takes your privacy seriously. This Privacy policy (“Privacy policy”) explains our data protection policy and describes the types of information we may process when you use TV Control: Smart Remote App and explains how we and some of the companies we cooperate processing that information.

When we refer to personal data (or personal information) we mean any information of any kind relating to an identified or identifiable natural person.

It is a natural person who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social status.

Our Privacy policy applies to all users, and others who access TV Control: Smart Remote App (“Users”).

For the purposes of the GDPR, we are the data controller.

PLEASE READ THE FOLLOWING PRIVACY POLICY, FOR INFORMATION REGARDING THE WAYS YOUR PERSONAL INFORMATION MAY BE PROCESSED, CAREFULLY. WHEN YOU USE TV Control: Smart Remote App YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO BE BOUND BY THESE TERMS. BY ACCESSING OR USING TV Control: Smart Remote App, YOU AGREE TO PROCESSING OF YOUR PERSONAL DATA WHICH IS PROVIDED TO US IN LINE WITH THE TERMS OF THIS PRIVACY POLICY.

## 2. INFORMATION WE PROCESS

There are two general categories of information we can process.

## 2.1 Information that you submit

We ask for and collect the following personal information about you when you use TV Control: Smart Remote App. This information is necessary for the adequate performance of the contract between you and us. Without such information it is impossible to provide complete functionality of TV Control: Smart Remote App all perform the requested services.

Authorization and/or Account Information. When you sign up for an account, we require certain information such as your email address or Facebook ID or Google ID – depending on TV Control: Smart Remote App settings.

Content Information, i.e. photos, pictures, video and audio files, documents and other data that you upload using TV Control: Smart Remote App.

Personal Information which you may fill in by yourself when TV Control: Smart Remote App is designed for tracking your info, storing your records and/or managing them for your convenience and upon your explicit request.

## 2.2 Information That Is Processed Automatically

When you use TV Control: Smart Remote App, some information about your device and your user behaviour may be processed automatically. This information is generally non-personal, and we may access it only in aggregated form. We process this information on the ground of our legitimate interest in improving TV Control: Smart Remote App and giving our users the best experience. Otherwise we may not be able to provide you with all the requested services and features of TV Control: Smart Remote App.

We use third-party automatic data processing technologies (such as Google and Facebook) to analyse certain information sent by your device or TV Control: Smart Remote App. Automatic data processing technologies (advertising or analytics tools) provide us with the data described below. We do not control, supervise or

respond for how the third parties providing your information process your personal data, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

What data may be processed:

Advertisers / Advertising ID, device make and model, mobile web browser type and version, IP address, MAC address and IMEI, account information (email etc), the device's operating system's make and version, locale information, MCC (Mobile Country Code) information, location and related data, cookies and similar technologies.

Processing information through automatic data processing technologies we use starts automatically when you start using TV Control: Smart Remote App.

TV Control: Smart Remote App may use automated processing of your personal data, including profiling which means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning your personal preferences, interests, behaviour, location or movements.

### 3. THE PURPOSES OF PROCESSING YOUR PERSONAL DATA

Our mission is to constantly improve TV Control: Smart Remote App and provide you with new experiences. As part of this mission, we use your information for the following purposes, In general our mission;

- To make our service available. We use information that you submit and information that is processed automatically to provide you with all requested services.
- To improve, test and monitor the effectiveness of TV Control: Smart Remote App. We use information that is processed automatically to better understand user behaviour and trends, detect potential outages and technical issues, to operate, protect, improve, and optimize TV Control: Smart Remote App.
- To provide you with interest-based (behavioural) advertising or other targeted content. We may use information that is processed automatically for

marketing purposes (to show ads that may be of interest to you based on your preferences). We provide personalized content and information to you, which can include online ads or other forms of marketing.

- To communicate with you. We use the information we have to communicate with you through newsletters, i.e. to send you marketing notifications, receive your feedback about TV Control: Smart Remote App experience, and let you know about our policies and terms. We also use your information to respond to you when you contact us.
- To prevent fraud and spam, to enforce of law. We really want TV Control: Smart Remote App to be free of spam and fraudulent content so that you feel safe and free. We may use your information to prevent, detect, and investigate fraud, security breaches, potentially prohibited or illegal activities, protect our trademarks and enforce our Terms of Use.

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

#### 4. SHARING OF YOUR INFORMATION

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

We collect the following categories of your personal information and may share it to third parties: identifiers, commercial information, internet or other electronic network activity information, geolocation data, and inferences drawn from these categories.

We will not rent or sell your personal data to third parties, but we may share your information from tools like cookies, log files, and device identifiers and location data, with third-party organizations that provide automatic data processing technologies for TV Control: Smart Remote App. We do not control or influence these third parties' tracking technologies or how they may be used.

We may also share certain information such as cookie data with third-party advertising partners. This information allows third-party ad networks, inter alia, to deliver targeted advertisements that they believe will be of most interest to you.

We may use one or more of the following third-party advertising services and analytics tools: Adjust; AdMob; Apple SearchAds; AppsFlyer; Facebook; Firebase; Flurry; Unity: Fabric; Google AdWords; ironSource; Mopub; Appcalibre ; OneSignal ; Kochava ; Applovin; Inmobi; Ogury, Startapp. In case you want to learn more about the services and privacy options please consult their websites and privacy policies.

TV Control: Smart Remote App may use certain third-party service providers like Amazon Web Services (AWS) to enhance user experience. Use of third-party services may require us to submit your personal information to their servers that provide automatic data processing technologies for TV Control: Smart Remote App.

TV Control: Smart Remote App may contain links to third-party websites/services or you may access TV Control: Smart Remote App from a third-party site. We are not responsible for the privacy practices or the content of these third-party sites or services linked to or from TV Control: Smart Remote App, including the information or content contained within them.

We may disclose your personal information if it needed for objective reasons, due to public interest or in other unforeseen circumstances:

- as required by law;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- if we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice in TV Control: Smart Remote App of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

## 5. INTERNATIONAL DATA TRANSFERS

We work in the international space and provide TV Control: Smart Remote App to our Users around the world.

We and third-party organizations that provide automatic data processing technologies for TV Control: Smart Remote App or our third-party advertising partners may transfer the automatically processed information across borders and from your country or jurisdiction to other countries or jurisdictions around the world.

If you are located in the European Union, US or other regions with laws governing data processing that may differ from England & Wales law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as in your jurisdiction.

This means that your personal information can be transferred to a third country, a territory or one or more specified sectors within that third country, or to the international organization where data protection and confidentiality regulations may not provide the same level of protection of a personal data as your country does.

We try to make sure that the recipient of any personal data provides a proper protection of the personal data received, in accordance with the current legislation on the protection of such information. By using TV Control: Smart Remote App, you agree that we may transfer your personal data to any third country, a territory or one or more specified sectors within that third country, or to the international organization.

For the purposes of data storage, we recourse to the services of the hosting organizations. We take your privacy seriously and, therefore, encrypt your personal data before sending it to the hosting organizations for the purposes of its storage. Please note that we cooperate only with those hosting organizations that have passed our security and reliability check.

## 6. HOW LONG WE USE YOUR PERSONAL DATA

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information that we physically access and store, you can request that we erase your personal information and close your account.

However, some data may still be stored for a certain time period if information is necessary to comply with legal obligation (taxation, accounting, audit) or in order to maintain safety and data backup settings, prevent fraud or other malicious acts.

## 7. EXERCISING YOUR RIGHTS

For the data we store and access you are entitled to address us regarding the following issues:

**Data Access and Portability.** You can request copies of your personal information held by us.

**Change or Correct Data.** Where you cannot update data by yourself through your account, you have the right to ask us to correct change, update or rectify your data.

**Data Retention and Deletion.** We generally retain data for as long as your account is in existence or as needed to provide TV Control: Smart Remote App. However, specific retention times can vary based on context of the processing we perform and on our legal obligations. You have the right to ask us to delete all or some of the personal data we hold about you. If you have an account, you can also delete your account at any time. We may need to retain some of your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations, or where we have a legitimate interest in doing so (e.g. to prevent fraud and abuse and maintain and enhance security).

**Restriction of Processing.** Under certain circumstances, you may have the right to limit the ways in which we use your personal information.

Please bear in mind that we ensure the above mentioned rights only with respect to the information that you submit.

When your personal information that is processed automatically you may object to such processing in some circumstances. Where your personal information is processed for direct marketing purposes, you may ask to cease processing your data for these direct marketing purposes. In order to exercise your right please contact the third party services listed in the Section IV of this Privacy Policy to learn how you can object to processing your data. Most of them have clear instructions on their privacy pages, functional API or other options.

Please note that you can opt-out of marketing tracking by emailing the developer account.

## 8. SECURITY

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

We take reasonable and appropriate measures to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information.

We implement appropriate technical and organizational measures, which are designed to implement data-protection principles, such as data minimization, in an effective manner and to integrate the necessary safeguards into the processing. We seek your personal data to be encrypted with proper and strong encryption algorithms, including hashing where possible.

Unfortunately, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We do our best to protect your personal data, nevertheless, we cannot guarantee its absolute security. In the event that your personal



information is compromised as a breach of security, we will promptly notify you in compliance with applicable law.

## 9. CHILDREN'S PRIVACY

TV Control: Smart Remote App is not intended for children under the age of 18. Therefore, we do not knowingly collect or solicit any personal information from children under 18. No one under age 18 may provide any personal information to TV Control: Smart Remote App. If you are under 18, do not use or provide any information on TV Control: Smart Remote App or through any of its features. Do not provide any information about yourself, including your email address. If we learn that we have collected personal information from a child under age 18 without verification of parental consent, we will erase that information as quickly as possible. If you believe that we might have any information from or about a child under 18, please contact us.

## 10.CHANGES TO THE PRIVACY POLICY

This Privacy policy may change from time to time.

Whenever we change this Privacy policy, we will post those changes to this Privacy policy and other places that we consider appropriate. Additional forms of notice of modifications or updates as appropriate under the circumstances may be provided to you.

## 11.HOW TO CONTACT US

If you have any questions about this Privacy Policy, please feel free to contact us at this email: [ldinan06@gmail.com](mailto:ldinan06@gmail.com)