

Privacy Policy

We develop and publish iOS applications and we may collect, store and process some data, including personal data. This privacy policy (“Privacy Policy”) sets out the main principles on which the data collected from you, or that you provide to us, will be processed by us. This Privacy Policy also aims to remind you about your rights and to provide you with all the elements you need to exercise them.

If you have any questions related to this Privacy Policy or our practices around privacy and data protection in general, please don’t hesitate to contact us.

BY USING THE PLATFORMS, YOU PROMISE US THAT YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY.

If you do not agree, or are unable to make this promise, you must not use the Platforms. In such case, you must (a) delete the App from your devices; (b) cancel any subscriptions using the functionality provided by Apple;

I. WHAT DATA DO WE COLLECT AND PROCESS?

You will find below explanations regarding the reasons why we may collect data and the legal bases we rely on in each case.

When you visit our Platforms, you may provide us with the following types of data, and we may collect and process such data in accordance with this Privacy Policy, as follows:

Photos.

- We may temporarily access the photos that you upload from your mobile device only while using our application via your camera or camera roll if you have granted us permission to access your camera or camera roll.
- You won’t be able to upload content from your camera roll unless we can access your device’s camera.
- We do not collect your photo albums even if you grant us your access to them.

- Please note that although we do not require or/and request any metadata attached to the photographs you upload, metadata (including, for example, geotags) may be associated with your photographs by default
- We do not store and collect your photos in the cloud.
- We do not use the photos you provide when you use the App for any reason other than to provide you with the photo editing functionality of the App.

Whenever you choose an effect that involves face pixelation (censor filter) we use special face recognition technologies to:

- Detect a face in a photo
- And apply the effect to your photo

Contact Data (To respond to communications that you send to us)

This may include your name and your email address. This information will be collected by us if you communicate with us, for example if you use the links on our Platforms to communicate with us via email.

Correspondence Data (To help address issues you raise with us and to improve the Platforms and our services).

This includes the information you provide when you request support through our Platforms, contact us via the email address provided in this Privacy Policy and elsewhere on our website and your views, opinions and feedback which you choose to provide in relation to the Platforms and our services, including any comment facilities and message boards.

Session Data (To administer, maintain and improve the Platforms and our services, including identifying you or your device across our Platforms.

To identify and respond to potential risks to the security of our Platforms (for example spammers, phishing attempts, screen scraping and other actions which may violate our [Terms of Use](#)).

This includes your IP address, your device's unique identifier details, browser details including version, device operating system, geo-location, time zone setting and time/date of access requests, the amount of data transmitted and the requesting provider. We may also capture other information about visits to our Platforms such as pages viewed and traffic patterns.

Cookie Data

Cookies are small files which are downloaded to your device when accessing our Platforms. Most web browsers automatically accept cookies. Please refer to paragraph 4 below for further details about our use of cookies.

Preference data (To infer your interests, including serving and suggesting content that you might like, and tailoring advertising to you based on such preferences).

This includes any information you choose to provide us, such as your affirmations preferences

Payment data

Our Platforms include purchases directly in the application (including subscriptions). If you want to make a purchase in the application, you may do this with the help of a payment system provided by AppStore (managed by Apple) and integrated into the apps. The in-app payment system is managed by the AppStore administration or its authorized partner. Under no circumstances do we collect or process any information related to your payment instruments, such as bank card number, its validity term or your name as written on it.

III. DATA RETENTION

1. By using our Platforms, you consent for us to store your personal data in line with legal, regulatory, financial and good-practice requirements.
2. The period for which we may retain your personal data will depend on the type of personal data collected, the purposes for which it was collected, applicable

limitation periods for the exercise of legal rights and whether any legal or regulatory obligations require the retention of the personal data.

IV. COOKIES AND TRACKERS

1. We use cookies and other software development kits (“SDKs”) and third-party libraries. Our Platforms uses the following categories of cookies:

Strictly necessary cookies

These are cookies that are required for the operation of our Platforms. They include, for example, cookies that enable you to load webpages.

Analytical/performance cookies

These cookies allow us to recognize and count the number of visitors to our Platforms and to see how visitors move around our Platforms. This helps us to improve the way our Platforms works, for example, by ensuring that visitors are finding what they are looking for easily.

Functionality cookies

These are used to recognize you when you return to our Platforms. This enables us to personalize our content for you and remember your preferences (for example, your choice of language or region).

Tracking ID

Every iOS device has a unique Tracking ID, for iOS devices, called an Identifier for Advertising (IDFA). These Tracking IDs enable app providers and advertisers to track user activity and target ads at those users.

2. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

3. You may block cookies by updating the relevant settings on your device or browser to allow you to refuse the setting of some or all types of cookies.

V. WHO DO WE SHARE YOUR DATA WITH?

We don't share your personal data except as consented by you or as described herein. We may need to share your personal data with selected third parties in the following circumstances:

Third party service providers

This may include providers of certain systems and services that we use to host, administer and maintain our Platforms, including for example the servers used to host our Platforms, email service providers, payment processors, fraud prevention vendors, analytics, customer service providers and other service providers.

Third party service providers for marketing purposes

If you explicitly consent to any marketing from us, certain personal data may be shared with third party service providers we use to help us carry out marketing including, for example, third party marketing automation platforms.

To comply with legal or regulatory requests

If we are under a duty to disclose or share your personal data to comply with any legal or regulatory obligation, we may share your personal data with a regulator or law enforcement agency.

VI. THIRD PARTY WEBSITES

Our Platforms may contain links to third party websites. If you follow a link to a third-party website, please note that this Privacy Policy does not apply to those websites. We are not responsible or liable for the privacy policies or practices of

those websites, so please check their policies before you submit any data to those websites.

VII. SECURITY

1. We take data security seriously. We implement and maintain appropriate technical and organizational measures including resilient security systems and protocols to protect the personal data we store.
2. We have put procedures in place to deal with any suspected data security breach and will notify you and applicable regulator of a suspected breach where the breach may cause a risk to you.
3. Our security procedures mean that we may occasionally request proof of identity before we are able to disclose personal data to you.

IX. ACCESSING YOUR PERSONAL DATA AND YOUR RIGHTS

As a result of us collecting and processing your personal data, you have the following legal rights:

1. To access personal data we hold on you;
2. To request us to make any changes to your personal data if it is inaccurate or incomplete;
3. To request your personal data is erased where we do not have a compelling reason to continue to process such personal data in certain circumstances;
4. To receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the personal data is based on:
 - (i) your consent;
 - (ii) our necessity for performance of a contract to which you are a party to; or
 - (iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means;
5. To object to, or restrict, our processing of your personal data in certain circumstances;

6. If we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;
7. To object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you;
8. If we are processing your personal data with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal data conducted pursuant to lawful processing grounds other than consent. You may do so by contacting us;

X. OUR POLICIES CONCERNING CHILDREN

Our Platforms are not intended for children (under the age of 13 or such higher age as required by applicable law). We do not knowingly collect or solicit any personal data or target interest based advertising to children and we do not knowingly allow children to register for or use the Platforms. Children should not use our Platforms or send us any personal data about themselves at any time. In the event that we learn that we have inadvertently gathered personal data from children, we will take reasonable measures to promptly erase such information from our records.