

PRIVACY POLICY

Sied LTD (hereinafter as “we”, “our”, or “us”) understands the importance of protecting your privacy. This Privacy Policy (the “Agreement” or “Policy”) explains what information of yours will be collected when you download, install, access, or use this mobile application-. (the “App” or “Software” or “Services”), and how such information will be used and shared. It also explains choices you have to control the collection, correction and/or deletion of such information. By using the Software, you consent to the Policy and to the collection, processing, disclosure and use of your information as described in this Policy.

1. Overview

This Policy applies only to information we collect in our App, e-mail and other electronic communications sent through or in connection with our App. This Policy DOES NOT apply to information collected by any third party. These third parties may have their own privacy policies, which we encourage you to read before providing information on or through them. For this Policy "GDPR" shall mean the General Data Protection Regulation (EU) 2016/679 of the European Parliament 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. Unless otherwise specified, all references made within this Policy to the European Union (EU) include all current member states to the European Union and the European Economic Area.

2. TYPES OF PERSONAL DATA WE COLLECT, FOR WHAT PURPOSES, UNDER WHAT LEGAL BASIS AND HOW WE PROCESS PERSONAL DATA.

If you access our Services or App, the App used on your device automatically sends information to our server and temporarily stores it in a log file. The following information is collected without your intervention and stored until it is automatically or manually deleted in the log file.

2.1 Usage data

We may use Xcode API to access your mobile device and query the about usage data when you interact with the Services. For example, we collect information about which features you've used, how you've used them. Our purpose is to customize your experience. We use your usage data to tailor the Services contents and make offers to your personal preferences. Processing of usage data for this purpose is based on: 6.1. f) GDPR (“processing is necessary for compliance with a legal obligation to which the controller is subject”).

2.2 Device and Location data.

We and our service providers may use Xcode API to access your mobile device and query the about device and location data which will be transferred to us automatically. Examples of data that may be collected and used include: language settings, time zone, type of device, device settings, operating system, ISP or your mobile carrier, hardware ID. Our service providers may help us approximate your location. They may, for example, use an IP address received from your device to determine approximate location or collect location information from device in accordance with the consent provided by your device.

Our purpose is to provide you with better Service. This includes use of personal data to support delivery of the Service under Terms of Service, to ensure that content provided by App is presented in the most effective manner, to prevent or address service errors or technical issues. Processing of device and location data for this purpose is based on: 6.1. b) of GDPR (“processing is necessary for the performance of a contract to which the data

subject is party") and 6.1 c) GDPR ("processing is necessary for compliance with a legal obligation to which the controller is subject").

2.3 Registration Related data.

We may use our API to access your Registration Related data when you register on the Software and use the Services (if applicable), such as name, e-mail address, birth date and photo. The purposes of the registration related information is: (i) to improve and customize the Software and Services; and/or (ii) to maintain and improve the quality and operation of the Software and Services; and/or (iii) to notify you of Software and Services updates; and/or (iv) to provide you with support and handle your complaints and/or feedback.

2.4 Advertising data.

We may use third party SDK (AppsFlyer) to collect your Apple Identifier for Advertising (IDFA) or Google Advertising ID (AAID), and use these data to recognize your device and support activities on advertising of our Service. These number values are not permanently tied to your device and, depending on your operating system, you can reset them through your device settings.

Our purpose is to optimize advertising. We and our partners may use your advertising data to inform, optimize and serve advertising based on your past use of this App. This activity is performed by tracking Usage data and by using other information that is transferred to the partners that manage the remarketing and behavioral targeting activity. You may opt out of these practices following the information here. Processing of personal data for this purpose is based on: 6.1. f) GDPR ("processing is necessary for the purposes of the legitimate interests pursued by the controller"), and more specifically, we wish to provide you useful or interesting information about the App, special offers and other our features that we think you might be interested in.

2.5 Analytical data

We use third party analytics tools (Appstore Connent) and third party SDK (Fabric) to help us measure traffic and usage trends for the Service. These tools may record data, such as: how often you use the App, referring/exit pages and URLs, device identifiers, events that occur within the App, aggregated usage, performance data. Our purpose is to perform research and analysis about your use of the App. This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design and develop the App and our new products. We also use such data for statistical analysis purposes to test and improve our offers. Processing of personal data for this purpose is based on: 6.1. b) GDPR ("processing is necessary for the performance of a contract to which the data subject is party") and .1. f) GDPR ("processing is necessary for the purposes of the legitimate interests pursued by the controller"), more specifically, research and analysis about how you use the Service helps us to enable you to enjoy the use of, and easily navigate Application, and/or better understand your needs and interests.

2.6 Camera, Photos data

In order to use some of the features of the Software, you may voluntarily grant us the permission to access to the camera or photo album to obtain photo in your mobile device. Only if you confirm the permission, will we gain access to your camera and album. When you use certain face recognition functions including but not limited to Daily Palmistry, Love Compatibility, Wealth Forecast, etc, we will use the sdk provided by third parties to analyze the facial features information, automatically capture the position and shape of the five sense organs or other organs in the photos, and process the photos, feedback the effect drawing to you. We capture the facial features information only for operating the face recognition functions and providing better effect drawing for you. For such photos, facial features

information and effect drawing, we will neither store nor share them with any third parties after processing.

2.7 Facial data

When you use certain face recognition functions, we will analyze the facial features information, automatically capture the position and shape of the five sense organs or other organs in the photos, and process the photos, feedback the effect drawing to you. We capture the facial features information only for operating the face recognition functions and providing better effect drawing for you. For such photos, facial features information and effect drawing, we will neither store nor share them with any third parties after processing. All information will be automatically deleted when the process is complete.

2.8 Other data

Our Service is dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data, we may modify, update and publish this Policy in the App. Please continue to pay close attention to this Policy. If you restrict certain data from being collected automatically, we may be unable to provide the Service.

3. WITH WHOM WE SHARE YOUR PERSONAL DATA

We will only disclose your personal data with your knowledge and as stated in this Privacy Policy. This includes disclosures that will enable us to fulfill our obligations to you, and allows us to manage our business operations. Your personal data may be shared as follows:

3.1 We share your personal data with service providers We will share your information with third parties only in the ways that are described in this Privacy Policy. We will not rent or sell your personal data to third parties, but in order to help them and us understand the usage patterns of Service for analytical purposes and to offer new features or otherwise tailor or enhance our Service, we may share your information with third parties that provide automatic data processing technologies for the App or providing service to the App. We do not have power to control or influence these third parties' tracking technologies or how they may be used. Therefore, if you do not want to share your personal data with any third-party organizations, please contact us by email for more details or do not use such service provided by that third party.

3.2 We may share your personal data for safety, legal purposes and law enforcement We use and disclose personal data as we believe necessary under applicable law, to enforce our Terms of Service, to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

3.3 We may share your personal data with third parties in case of change of control As we develop our business, we may buy or sell assets or business offerings. Customer information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

5. PROTECTION OF PERSONAL DATA

We take precautions — including administrative, technical, and physical measures — to safeguard your personal data against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. We use firewalls, encryption

technology and Network access designed to protect against fraud and identity theft; our data is only stored in centers that provide high-level security for user's data. We also protect user's privacy by seeking to minimize the amount of sensitive data. We also seek appropriate contractual protection from our partners regarding their treatment of user data. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

6.CHILDREN'S PRIVACY

Although our Service is a general audience service, our App is not intended for children under the age of 16 or other statutory minimum age according to the applicable laws and regulations in your country (the "Minimum Age") . We do not knowingly collect, maintain, or use personal data from children under the Minimum Age, and no part of the Service is directed to children under the Minimum Age. If you learn that your child has provided us with personal data without your consent, you may alert us at KedrilAmalazinov@gmail.com. If we learn that we have collected any personal data from children under the Minimum Age, we will promptly take steps to delete such information and terminate the Service for the child.

7.CHANGES TO THIS PRIVACY POLICY

We may modify this Agreement at any time. If we decide to make material changes to this Agreement, we will provide notice through our Service, or by other means, to provide you an opportunity to revise changes before they become effective. If you disagree with the changes to this Agreement, you should stop using Service. Your continued use of our Service after we send a notice about our changes to this Agreement means that you are consenting to the updated Agreement.

8.DATA RETENTION

We retain your personal data we collect as described in this Agreement and for as necessary for the provision of the Services, internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements (e.g. settlement). The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the Services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

9.CONTACT US

You may contact us at any time for details regarding this Agreement. For any questions concerning your personal data please contact us at KedrilAmalazinov@gmail.com.

This Privacy Policy is effective upon acceptance by users or publication by us once update or modification. This Privacy Policy is incorporated into, and is subject to the Terms of Service.