Effective: February 8, 2023

Welcome to SolveMe's Privacy Policy. We are grateful that you entrusted your information to us, and we want to demonstrate to you how earnestly we regard it.

This Privacy Policy will help you decide what kind of information you are comfortable sharing with us. Our Privacy Policy is aimed to provide clarity in our practices and describe what information we gather, why we do it, how we utilize your Personal information and what are your liberties regarding shared information.

Please go through the Privacy Policy attentively.

1. About The Service

SolveMe is a service that scans and solves homework problems by using the camera of your mobile device in real time. We are devoted to creating the best user experience while keeping your private information safe all the time.

SolveMe is provided by Individual Entrepreneur Zhanna Rabtsevich, Georgia, Tbilisi city. We will classify "SolveMe" also as "we," "us", or "our" where suitable.

This Privacy Policy pertains to the to the SolveMe mobile app (the "Application"), (the Application and all content made available through the Application and/or the Site constitutes the "Service.") and describes which personal data is being gathered from you, or that is provided to us.

Please note that by utilizing our Services, you acknowledge and accept our privacy practices.

2. Issues Not Accounted For By This Privacy Policy

We would like to remind you that this Privacy Policy only relates to personal data that we process while you use the Service. It is not applicable to any third parties' websites and/or services that you may come across when you use the Service. Third parties have their own privacy policies and we are not liable for the use or distribution of any information you provide them.

We invite you to attentively read the privacy policies applicable to any websites and/or services managed by third parties. Although, when we do have the capacity to select third parties, we always try to match with ones that share similar principles.

In case you need any additional information, you will find the contact information under "Your Rights" section.

3. Data We May Gather From You

In pursuance of creating the best user experience the following types of personal data may be gathered:

(i) Information You Provide to Us Directly

We may gather the following data from our users that may, in specific circumstances, be considered as personal data:

- Images and text you send in order to provide feedback about the Service;
- Your email address, in case you decide to subscribe to our mailing list, in need of support or would like to provide your comments about the Service;
- Your email address, screen name and age, if you decide to create an account;
- Subscription information. In that case you will provide us or our payment service provider with information about your credit or debit card number or other financial information.

If you contact us or our customer support team, we will gather the information you provide. To ensure top-quality customer service, a history of this correspondence may be kept.

(ii) Information Gathered Automatically

The Service may automatically collect some information from you that in specific circumstances, be considered as personal data:

- Location data: We may gather, utilize and share location data, for example the real-time geographic location of your device. Certain features of the Service may make use of the location data, such as changing the default language displayed in the Service. By using the Service, you agree to having your location data collected;
- Usage data: We get information about how you use the Service, for example how long you spend on particular parts of it, etc. This data helps us learn more about how people use our Service and how we can make the experience better for them. Additionally, the Service may collect information about your transactions, such as your in-app purchase history or homework problems. Such data might be sent to the Service servers from a storage device.;
- Device data: We gather data about the device you use to access the Service, such as the hardware model, operating system and version, non-hardware app instance identifiers, unique device identifiers, MAC address, IP address, and mobile network information:
- Videos or pictures taken with the camera: Through the app, we use images and videos taken with your device's camera. You can use this information to identify and solve a homework problem. This information can also be utilized to test and advance the Service's quality and features.
- Analytics technologies: The Service employs technologies such as cookies*, beacons, anonymous unique identifiers, tags, crash logs, and scripts. These technologies are used to determine trends, manage the Service, enable features, and collect

- demographic information about our users. Third-party technology is used to enable such technological features.
- Traffic optimization and distribution: In order to provide a more pleasant user experience, the Service may use third-party traffic optimization and distribution services. These service providers who collect and share data automatically have their own privacy policies that apply to their operations. Cookies are also used by these providers*.
- Third-party analytics providers: On our behalf, we may use third-party analytics services to evaluate the Service. Cookies*, web beacons, crash logs, and other technologies may be used by these service providers to gather information about your use of the Service. These service providers enable us to collect, monitor, and analyze data about how users use the Service in order to better understand how users use the Service, advance the functionality of the Services, and better tailor the Service to users' needs. As a result, some of the automatically collected data is shared with such third-party service providers, who have their own privacy policies that apply to their operations. We can provide you with the most recent list of analytics service providers if you contact us at jjapps7@gmail.com.

4. The Objectives Of Using Your Information

The primary goal of using your information is to increase the quality of our Services and your experience while using them.

a) We use the personal information you give us directly for these purposes:

- To establish and manage your registration with the Service, if you choose to register and are of legal age to do so;
- To oversee the Service:
- To make features available through the Service;
- To create, improve, and safeguard the Service;
- in order to communicate with you;
- To assist the progress of and process any in-app purchases made through the Service;
- To rule out and investigate fraud and other misappropriations;
- To secure our rights and/or property;
- To operate and advance our products and features;
- To conduct market research;
- To conduct electronic direct marketing in accordance with applicable laws;
- To review and analyze the Service; and
- To guarantee the Service's technical functionality and security.

Please be aware that the images and feedback you send by using the Service are used to improve the Service, including its homework problem solving capabilities.

b) The following uses are made of the automatically collected data:

To provide the service;

- To enhance customer support;
- To tailor user experience;
- To maintain the Service;
- To provide features accessible in the Service;
- To determine the quality of the Service;
- To develop, improve, and protect the Service;
- To conduct market research;
- To review and analyze the Service, as well as analyzing trends in regards to the use of the Service; and
- To guarantee the Service's technical functionality and security.

5. The Rules We Apply When Collecting Your Personal Data.

We will always be open and will stand by the principles outlined below when collection your personal information:

- Consent: If we want to collect your data, we will first ask for your permission. We will also provide you with a contact address where you can revoke your consent at any time.
- Legitimate interest: We will utilize your information when we have a legitimate reason to.
 For example, we will use your photos to provide the Service and collect information about how to enhance our AI.
- Processing that is legal and transparent. We follow relevant legislation and do our best to present you with all of your rights.
- Privacy by design: We consider your privacy at every stage of the development of our Services. As a result, we incorporate data-protection principles like pseudonymization and data minimization.
- Privacy by default: We have put in place appropriate safeguards to ensure that only the
 data required for each specific purpose is processed. In practice, this is reflected in the
 amount of personal data collected, the extent to which data is processed, and its
 accessibility.

6. How We Reveal Your Information

Unless otherwise stated, we do not sell, lease, rent, or otherwise disclose personal information about our users to third parties.

We may permit third-party companies to provide analytics about your use of our Services.

This can assist us in analyzing and better understanding how our users use our Services, determining whether changes and updates to Services work as intended and are well received, or assisting us in targeting advertisements that are relevant to you.

These entities may collect such information using cookies and other technologies, such as your IP address, pages visited, web browser, mobile network information, links clicked, the amount of time spent on Services, and conversion data (excluding your name, email address, mailing address, or telephone number).

We, as data controllers, or our affiliated companies, may utilize your Personal data only for the goals stated in this Privacy Policy and when permitted by applicable law.

Personal information collected through the Service may be revealed in the following ways:

a) Personal information you provide directly:

We may share personal information you provide to the Service with the following third parties:

- To service providers, such as data storage providers, who enable us to provide you with the Service:
- In accordance with applicable laws, to our business partners, such as advertising partners;
- To public bodies, such as law enforcement, if we are legally obligated to do so or if we need to protect our own or third-party rights;
- To our affiliates and subsidiaries; in accordance with this Privacy Policy, or a subsequent owner, co-owner, or operator of the Service, as well as their advisors, in connection with a corporate merger, consolidation, restructuring, sale of substantially all of our stock and/or assets, bankruptcy proceedings, or other corporate reorganization;
- To our technology partners, such as our partners in machine vision; and
- To other third parties, with your permission or in accordance with other legal requirements or permissions.

Please keep in mind that if you expressly instruct us to share your personal information with a third party, the shared information is then under the control of that third party and is subject to that third party's privacy policies.

b) Information gathered automatically:

The information collected automatically in the Service may be uncovered to the following categories of third parties:

- To service providers, for example companies that analyze data;
- In accordance with applicable laws to our business partners, such as advertising partners;
- To public authorities, such as law enforcement, if we are legally required to do so or if we
 are required to do so by law or need to safeguard our rights or those of others;
- To our affiliates and subsidiaries; in accordance with this Privacy Policy, or a subsequent owner, co-owner, or operator of the Service and their advisors in connection with a corporate merger, consolidation, restructuring, sale of substantially all of our stock and/or assets, bankruptcy, or other corporate reorganization;
- To our technology partners, such as machine vision technology partners; and
- To other third parties, with your permission or in accordance with other legal requirements or permissions.

Please be aware that the images you have taken will never be shared with any service provider, advertising agency, or other business partner or third party.

Furthermore, we may disclose information to third parties in aggregate or derivative form that does not constitute personal data and does not allow individual user identification.

7. Additional Features From Third Parties

We may decide to broaden our Services with third-party content from time to time in order to provide you with additional features and an improved user experience. The use of this third-party content will never be essential in order to use the Services. If you use such third-party content, you may need to disclose some Personal Information to such third parties.

We will ensure that any third-party content provider adheres to our Terms of Use, this Privacy Policy, and the principles outlined therein, and we will make sure that your Personal Information is deleted promptly after you finish using additional features.

8. Your Rights

You have complete control over your personal information. That's why, we want to provide you with a clear list of your rights in relation to the personal data we hold about you, regardless of where you are located:

- Right to be forgotten. The right to request that we delete all available data about you. If
 you ever want to start over, please contact us and we will delete all personal information
 gathered during your use of the Services.
- Right to object. This right entitles you to request that we stop processing your data at any given moment. We only gather personal data from users if we have a legitimate reason to do so.
- Right to rectification. The right to have not fully completed, false, outdated personal
 information corrected, or updated. The best way to achieve that is to log in to the Service
 and alter the necessary information in the account settings of the Service.
- Right to restrict processing. Profiling is the sole automated processing of personal data that evaluates some personal aspects about you, such as the country from which you use our Services, so that we can show you more relevant ads. Unless you have given us your consent or there is a legal basis/justified interest, you will not be subject to such automated processing and decision making. Profiling is typically used for incorporating relevant marketing. You will face no legal consequences as a result of our use of such processing.
- Right to access. You have the right to request access to Personal information we hold about you, or to request a copy of this information.
- Right to transmit data. You have a right to request and acquire the Personal data you
 provided us in a commonly used format and you can relay that information to another
 controller or utilize it for your own reasons.

- Right to data minimization. The information we gather is sufficient only to fulfill the goal for which this data was collected.
- Right to be informed. We will notify you about processing of your Personal data, reasons
 for processing, transmission of your data, retention policy, as well as information about
 us and contact details if you ever need to contact us.

You agree to receive electronic communications from us by providing data to the Service that forms the basis of communications with you, such as contact information. However, you have the following options if you do not want to receive electronic direct marketing communications from us: All electronic marketing communications that you may get from us, for example e-mail messages and SMS messages, provide you with an opportunity to opt out of receiving such communications in the future.

We may ask you to provide proof of identity before we can comply with some of your requests for your protection and the protection of all our users.

No user shall ever face discrimination because they exercise their privacy rights. Please keep in mind, however, that some information is sometimes required to provide the Services or to offer promotions, discounts, or other deals. You can always ask for clarification on how your request might affect your participation in such cases. For example, we cannot provide customer service unless you provide us with your contact information.

9. The Rules We Use When Processing Your Personal Information

Whatever the purpose for processing your personal information, you can be confident that we will always be open and transparent, adhering to the following principles:

- Permission: If we want to collect your data, we will first ask you. This is essential to us because we want you to have complete control over your personal information at all times. We will also provide you with a contact address where you can revoke your consent at any time.
- Lawfulness, Integrity and Clarity. We only process your information in the trustworthy, non-misleading, and sincere manner that we believe you would reasonably expect from a service provider such as ourselves.
- Purpose restriction. We only process data for the goals described in this Privacy Policy.
- Justifiable interest: We will utilize your data where we have reasonable interest to do so.
 For example, we will use the photos taken by you so that we can collect information about how to enhance our AI.
- Accuracy. We make every effort to keep our records up to date and have systems in place to correct any errors. The easiest way to change your personal information is through the app.
- Privacy by design: We include data-protection standards such as encryption.
- Privacy by default: Only essential information is processed for each specific reason.
- Storage limitation. We only keep Personal information for as long as we have a valid need for it.

Integrity and confidentiality (Security).

10. Our Cookie Policy

Cookies are small text files that are accumulated within a web browser and can be recovered when you revisit the website.

Cookies perform a variety of functions, and we, like most other service providers, use cookies and similar tracking technologies to remember your preferences, keep you signed in, allow you to navigate between pages efficiently, and generally increase the quality of your user experience. Some cookies are required for the operation of our Services, others assist us in improving our performance by providing analytical data, and still others are used for marketing purposes. All such technologies are referred to as "cookies" in our Privacy Policy.

Main types of cookies:

- **First-party cookies** (i. e. our cookies) are designed by the web location that you visit, for example, our Website. Information kept in our own cookies is undisclosed and does not include personal data like a name or email address. Meaning it is impossible to link data stored in cookies with a particular person.
- Third-party cookies are designed by other web locations. Please keep in mind that we
 may not have control of the storage or have direct access to these cookies. You should
 carefully read the privacy and cookie policies of these services in order to learn how
 these third parties use cookies.
- Session cookies are temporary cookies that only last for the duration of your visit to our website.
- Persistent cookies are cookies which are kept on your device after your visit and may be accessed by our Website every time you re-visit the Website

Cookies, in general, do not contain any information that can be used to identify an individual person, but rather are used to identify a browser or a specific device.

a) How do we use cookies?

The information below explains the cookies we use on the Website and why. keep in mind that only Essential cookies will be turned on as these cookies are crucial. If this type of cookie is disabled, this can affect how the Website functions. Although you can always disable Essential cookies in your browser.

Essential

Cookies are required to navigate our website, provide the services you have requested, and prevent security threats.

Our own cookies: sign-in related cookie (3 minutes). **Third party cookie**: cookie used to prevent security threats: Cloudflare (1 month).

Functional

These cookies enable our Website to remember choices you make (such as whether you accept cookies on the Cookie Notification Bar and your sign-in data), allowing us to provide enhanced, more personalized features. These cookies are not capable of tracking your browsing activity on other websites. These cookies, for example, are used to determine whether or not the Cookie Notification Bar should be displayed. If you have already decided whether or not to use cookies, we will not show you the Bar again. These are our **own cookies** (30 days).

Analytics

These cookies and scripts are used to track, analyze, and anonymously report on how you use our website. They assist us in understanding how visitors interact with the Website by anonymously collecting and reporting information. This website makes use of Google Analytics, a web analytics service provided by Google LLC ("Google"). Cookies are used by Google Analytics to analyze how you use the Website. Cookie information about your use of this website is transferred to the United States of America. **Third-party cookie** used: Google Analytics (2 years).

Marketing

These cookies are used to deliver advertisements that are more relevant to you and your interests on our or third-party websites, as well as to measure the effectiveness of advertising campaigns. Cookies and technologies from our marketing partners (Google) and/or social media platforms may be used (Facebook). These technologies assist us in measuring the effectiveness of our marketing campaigns and understanding how visitors navigate to the Websites from our advertisements on other websites. They assist us and our marketing partners (Google LLC and/or Facebook Inc.) in determining how many times people who click on our ads use our services or perform a specific action, and this information is transmitted to our aforementioned marketing partners. These technologies are used to collect statistics on visitors who interact with our Websites and other online content, to estimate the effectiveness of our advertisements, and to provide more relevant information to our visitors.

This involves using previously gathered information about your activities and interests to select ads and whether you took any action related to the advertisement, such as clicking an ad. We use the following for this purpose:

(i)Retargeting

This website implements **retargeting** technology for online advertising. That way the Internet browsers can be addressed with ads that have previously shown interest in our services. The exhibit of the advertisements is done based on a cookie analysis of the preceding visit behavior.

(ii) Facebook-Pixel

The social network Facebook Inc.'s "Facebook Pixel" is used (Facebook). The Facebook pixel can monitor user behavior after they click on a Facebook ad. We can understand how our marketing measures are being implemented on Facebook with the help of the Facebook pixel and, if necessary, take optimization measures. For more information on cookies and similar technologies placed by Facebook, please visit: https://www.facebook.com/policies/cookies/. If you want to disable Facebook's cookie storage, you must change your browser settings. The information gathered by our Website remains anonymous and does not reveal the identity of the users. Facebook stores and processes the data for its own advertising purposes in accordance with the Facebook Data Directive, which we invite you to visit at (https://www.facebook.com/about/privacy/).

You must read the privacy policies of the listed third parties, whose cookies and similar technologies may include advertising identifiers and device identifiers.. These cookies are placed by **third parties**: Facebook (2 months) and Google Ads (3 months).

Personalization

They are used for modifying content, including ads.

b) How to manage cookies on your web browser

Most web browsers let users control the majority of the cookies through the browser settings. To find out more about cookies visit www.allaboutcookies.org. To find out more about cookies visit www.allaboutcookies.org.

You can restrict, block, or delete cookies by altering your browser settings but that may lead to the website not working properly.

Find out how to manage cookies on the most frequently used browsers:

Google Chrome

Internet Explorer

Mozilla Firefox

Safari (Desktop)

Safari (Mobile)

Android Browser

Opera

Opera Mobile

To restrict tracking by Google Analytics across all websites, visit http://tools.google.com/dlpage/gaoptout.

Please keep in mind that if you choose to reject cookies, you may not be able to use all of the features of our Website, and any communications you receive from us may be less relevant to you than they could have been. Disabling a cookie or cookie category does not delete the cookie from your browser; you must do this from within your browser.

c) How can I restrict, block, or delete cookies?

When you visit us, strictly necessary cookies are always enabled. On your first visit, we will inform you about our other cookie types and ask you to select which cookies we may use. You can always reconsider.

You can access and change all cookie settings in your web browser's settings.

Most web browsers accept cookies automatically, so you must change, delete, or block them manually. For instructions on how to clear cookies on mobile devices, consult your phone's manual.

11. Our Security Measures

We use encryption to protect your Personal information from unauthorized access or loss, exploitation, or modification by third parties by storing it in a firewalled and protected database with regidly limited and controlled access rights. We have made efforts to store personal data gathered through the Service in a secure operating environment that is not accessible to the general public, but we are unable to guarantee the data's security while it is being transmitted or stored on our systems. In addition, we do not warrant or represent that personal data about you will be protected against loss, misuse, or alteration by third parties. Although we make every effort to ensure the integrity and security of personal data, we cannot guarantee that our security measures will prevent third parties, such as so-called hackers, from gaining unauthorized access to personal data.

12. International Transfers Of Personal Data

Due to the reason that we operate globally, some elements of the Service may be hosted on servers in countries other than your own. The laws governing the security of personal information in these countries may differ from those in your home country. Please be aware that personal data gathered by us is transferred outside the European Union / European Economic Area, especially if you are located within the European Union. By using our Services, you agree to the transfer of personal data about you outside your home country and, where applicable, outside the European Union / European Economic Area.

Wherever we transfer, keep, or manage your Personal information, we will take justifiable steps to protect the privacy of your Personal information. These steps may involve attaining your consent or putting in place contractual clauses outlining the rules and obligations associated with such transfer or processing.

13. Advertising

We collaborate with a number of third-party advertising networks, marketing analytics service providers, and website analysis firms, such as Facebook and Google, to support and improve the Services (collectively, "Third Party Advertising Service Providers"). These Third Party Advertising Service Providers collect and use personal data about your visits to and use of the Website, mobile Application, and other websites in order to serve you with advertisements and content tailored to your preferences and likely interests, or to better understand ad effectiveness. Market research will also make use of aggregate demographic and interest data.

Furthermore, your mobile device may include settings that allow you to control the collection, use, and transfer of mobile app data for online behavioral advertising (for example, Apple iOS' Advertising ID and Google Android's Advertising ID). Please keep in mind that opting out does not prevent all advertisements from being displayed to you.

14. Children's Privacy

When you use our Services, we record your age. This is due to the fact that we will never knowingly collect personal information from children under the age of 13 (or relevant age in your country).

If you are under the age of 16, we will seek your permission or the permission of your authorized guardian before processing your Personal information in any way.

We never sell your information and always ask for your permission. This applies especially to children under the age of 16, regardless of where they live.

If you believe we have unknowingly collected personal information about a child, please contact us at jjapps7@gmail.com.

15. Data retention

We only keep Personal data for as long as it is required for the purposes outlined in this Privacy Statement. General data retention rules require that personal data be deleted after a certain period of time, anonymized, or retained in another aggregated form in which you cannot be personally identified. All such practices are referred to as "delete" in our Privacy Policy.

From your first use of the Services, we only collect and store anonymized data. We intend to keep it that way in the absence of any legal requirements regarding data retention. In other cases, such as tax or employment law, we will follow applicable legal requirements.

In any case, if you request it or withdraw your consent to processing, we will delete any Personal data. We will also delete data that is no longer relevant or necessary for the original purpose of processing.

- deletion of the unique identifiers that allow a data set to be assigned to a specific person;
- deletion of specific pieces of information that identify the data subject;

- detachment of personal data from non-identifying information (for example, separating an order number from the customer's name and address); or
- collection of personal information in a way that any allocation to any individual is impossible.

16. Modifications To The Privacy Policy

We reserve the right to modify this Privacy Policy at any time. The "Last Updated" legend at the top of this page indicates when changes to the Privacy Policy have been made. If we make significant changes to how we use and disclose personal data, we will post a notice in the Service. To stay informed about our privacy practices, we encourage you to review the Privacy Policy whenever you access the Service. Your continued use of the Service after any changes to this Privacy Policy constitutes your acceptance of those changes.

17. Issues Or Concerns?

Should you have any questions about this Privacy Policy or the security of the personal data we keep about you, please contact us via e-mail at jjapps7@gmail.com. We seek to immediately assist you.