

Barnanöfn Privacy policy

We respect your privacy and are committed to protecting it through our compliance with this privacy policy ("Policy"). This Policy describes the types of information we may collect from you or that you may provide ("Personal Information") in the "Barnanöfn" mobile application ("Mobile Application" or "Service") and any of its related products and services (collectively, "Services"), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

This Policy is a legally binding agreement between you ("User", "you" or "your") and b4k (doing business as "Barnanöfn", "we", "us" or "our"). If you are entering into this Policy on behalf of a business or other legal entity, you represent that you have the authority to bind such an entity to this Policy, in which case the terms "User", "you" or "your" shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this Policy, you must not accept this Policy and may not access and use the Mobile Application and Services. By accessing and using the Mobile Application and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

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Automatic collection of information

When you use the Mobile Application, our servers automatically record information that your device sends. This data may include information such as your device's IP address and location, device name and version, operating system type and version, language preferences, information you search for in the Mobile Application, access times and dates, and other statistics.

Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding the usage of the Mobile Application and Services. This statistical information is not otherwise aggregated in such a way that would identify any particular User of the system.

Collection of personal information

You can access and use the Mobile Application and Services without telling us who you are or revealing any information by which someone could identify you as a specific, identifiable individual. If, however, you wish to use some of the features offered in the Mobile Application, you may be asked to provide certain Personal Information (for example, your name and email address).

We receive and store any information you knowingly provide to us when you create an account, publish content, make a purchase, or fill any forms in the Mobile Application. When required, this information may include the following:

- Account details (such as user name, unique user ID, password, etc)
- Contact information (such as email address, phone number, etc)
- Basic personal information (such as name, country of residence, etc)
- Sensitive personal information (such as ethnicity, religious beliefs, mental health, etc)
- Proof of identity (such as a photocopy of a government ID)
- Payment information (such as credit card details, bank details, etc)
- Geolocation data of your device (such as latitude and longitude)
- Certain features on the mobile device (such as contacts, calendar, gallery, etc)
- Information about other individuals (such as your family members, friends, etc)
- Any other materials you willingly submit to us (such as articles, images, feedback, etc)

Some of the information we collect is directly from you via the Mobile Application and Services. However, we may also collect Personal Information about you from other sources such as social media platforms, public databases, third-party data providers, and our joint partners. Personal Information we collect from other sources may include demographic information, such as age and gender, device information, such as IP addresses, location, such as city and state, and online

behavioural data, such as information about your use of social media websites, page view information and search results and links.

You can choose not to provide us with your Personal Information, but then you may not be able to take advantage of some of the features in the Mobile Application. Users who are uncertain about what information is mandatory are welcome to contact us.

Use and processing of collected information

We act as a data controller and a data processor when handling Personal Information, unless we have entered into a data processing agreement with you in which case you would be the data controller and we would be the data processor.

Our role may also differ depending on the specific situation involving Personal Information. We act in the capacity of a data controller when we ask you to submit your Personal Information that is necessary to ensure your access and use of the Mobile Application and Services. In such instances, we are a data controller because we determine the purposes and means of the processing of Personal Information.

We act in the capacity of a data processor in situations when you submit Personal Information through the Mobile Application and Services. We do not own, control, or make decisions about the submitted Personal Information, and such Personal Information is processed only in accordance with your instructions. In such instances, the User providing Personal Information acts as a data controller.

In order to make the Mobile Application and Services available to you, or to meet a legal obligation, we may need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Any of the information we collect from you may be used for the following purposes:

- Create and manage user accounts
- Fulfil and manage orders
- Deliver products or services
- Improve products and services
- Send administrative information
- Send marketing and promotional communications
- Send product and service updates
- Respond to inquiries and offer support
- Request user feedback
- Improve user experience
- Post customer testimonials
- Deliver targeted advertising
- Administer prize draws and competitions
- Enforce terms and conditions and policies
- Protect from abuse and malicious users
- Respond to legal requests and prevent harm
- Run and operate the Mobile Application and Services

Processing your Personal Information depends on how you interact with the Mobile Application and Services, where you are located in the world and if one of the following applies: (a) you have given your consent for one or more specific purposes; (b) provision of information is necessary for the performance of this Policy with you and/or for any pre-contractual obligations thereof; (c) processing is necessary for compliance with a legal obligation to which you are subject; (d) processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us; (e) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. We may also combine or aggregate some of your Personal Information in order to better serve you and to improve and update our Mobile Application and Services.

We rely on the user's consent as a legal base upon which we collect and process your Personal Information.

Note that under some legislations we may be allowed to process information until you object to such processing by opting out, without having to rely on consent or any other of the legal bases above. In any case,

we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Payment processing

In case of Services requiring payment, you may need to provide your credit card details or other payment account information, which will be used solely for processing payments. We use third-party payment processors ("Payment Processors") to assist us in processing your payment information securely.

Payment Processors adhere to the latest security standards as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. Sensitive and private data exchange happens over a SSL secured communication channel and is encrypted and protected with digital signatures, and the Mobile Application and Services are also in compliance with strict vulnerability standards in order to create as secure of an environment as possible for Users. We will share payment data with the Payment Processors only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries related to such payments and refunds.

Please note that the Payment Processors may collect some Personal Information from you, which allows them to process your payments (e.g., your email address, address, credit card details, and bank account number) and handle all the steps in the payment process through their systems, including data collection and data processing. The Payment Processors' use of your Personal Information is governed by their respective privacy policies which may or may not contain privacy protections as protective as this Policy. We suggest that you review their respective privacy policies.

Managing information

You are able to delete certain Personal Information we have about you. The Personal Information you can delete may change as the Mobile Application and Services change. When you delete Personal Information, however, we may maintain a copy of the unrevised Personal Information in our records for the duration necessary to comply with our obligations to our affiliates and partners, and for the purposes described below. If you would like to delete your Personal Information or permanently delete your account, you can do so on the settings page of your account in the Mobile Application.

Disclosure of information

Depending on the requested Services or as necessary to complete any transaction or provide any Service you have requested, we may share your information with our trusted subsidiaries and joint venture partners, contracted companies, and service providers (collectively, "Service Providers") we rely upon to assist in the operation of the Mobile Application and Services available to you and whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. We will not share any personally identifiable information with third parties and will not share any information with unaffiliated third parties.

Service Providers are not authorised to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. Service Providers are given the information they need only in order to perform their designated functions, and we do not authorise them to use or disclose any of the provided information for their own marketing or other purposes. We will share and disclose your information only with the following categories of Service Providers:

- Cloud computing services
- Communication and collaboration services
- Data analytics services
- Data storage services
- Financial services
- Performance monitoring services

- Product engineering and design services
- Sales and marketing services
- Social networks
- User authentication services
- Website hosting service providers

We may also disclose any Personal Information we collect, use or receive if required or permitted by law, such as to comply with a subpoena or similar legal process, and 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.

In the event we go through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, your user account, and your Personal Information will likely be among the assets transferred.

Retention of information

We will retain and use your Personal Information for the period necessary as long as your user account remains active, to enforce our Policy, resolve disputes, and unless a longer retention period is required or permitted by law up to a maximum of 3 months.

We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

Transfer of information

Depending on your location, data transfers may involve transferring and storing your information in a country other than your own. The transfer of

your Personal Information to countries outside the European Union will be made only if you have explicitly consented to it or in the cases provided for by the GDPR and will be processed in your interest.

You are entitled to learn about the legal basis of information transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by us to safeguard your information. If any such transfer takes place, you can find out more by checking the relevant sections of this Policy or inquire with us using the information provided in the contact section. Note that we are dedicated to ensuring the security of your personal data, adhering strictly to the guidelines outlined in our privacy notice and conforming to the applicable legal requirements.

Region specific notices

Out of respect for your privacy, we have implemented additional measures to comply with the obligations and rights associated with the collection of Personal Information as dictated by the laws governing the regions of our users.

Disclosures for residents of the EU/EEA

If you are a resident of the European Union ("EU") or the European Economic Area ("EEA"), you have certain rights in relation to your Personal Information based on the GDPR that we comply with as part of our commitment to your privacy. Unless otherwise expressly stated, all terms in this section have the same meaning as defined in the GDPR.

(a) Right to withdraw consent: You have the right to withdraw consent where you have previously given your consent to the processing of your Personal Information. To the extent that the legal basis for our processing of your Personal Information is consent, you have the right to withdraw that

consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

(b) Right to access: You have the right to learn if your Personal Information is being processed by us, obtain disclosure regarding certain aspects of the processing, and obtain a copy of your Personal Information undergoing processing.

(c) Right to rectification: You have the right to verify the accuracy of your information and ask for it to be updated or corrected. You also have the right to request us to complete the Personal Information you believe is incomplete.

(d) Right to object to the processing: You have the right to object to the processing of your information if the processing is carried out on a legal basis other than consent. Where Personal Information is processed for the public interest, in the exercise of an official authority vested in us, or for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection. You must know that, however, should your Personal Information be processed for direct marketing purposes, you can object to that processing at any time without providing any justification. To learn whether we are processing Personal Information for direct marketing purposes, you may refer to the relevant sections of this Policy.

(e) Right to restrict the processing: You have the right, under certain circumstances, to restrict the processing of your Personal Information. These circumstances include: the accuracy of your Personal Information is contested by you and we must verify its accuracy; the processing is unlawful, but you oppose the erasure of your Personal Information and request the restriction of its use instead; we no longer need your Personal Information for the purposes of processing, but you require it to establish, exercise or defend your legal claims; you have objected to processing pending the verification of whether our legitimate grounds override your legitimate grounds. Where processing has been restricted, such Personal Information will be marked accordingly and, with the exception of storage, will be processed only with your consent or for the establishment, to

exercise or defence of legal claims, for the protection of the rights of another natural, or legal person or for reasons of important public interest.

(f) Right to delete: You have the right, under certain circumstances, to obtain the erasure of your Personal Information from us. These circumstances include: the Personal Information is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure such as where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, to exercise or defence of legal claims.

(g) Right to data portability: You have the right to receive your Personal Information that you have provided to us in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance from us, provided that such transmission does not adversely affect the rights and freedoms of others.

(h) Right to complaint: You have the right to complain to a data protection authority about our collection and use of your Personal Information. If you are not satisfied with the outcome of your complaint directly with us, you have the right to lodge a complaint with your local data protection authority. For more information, please contact your local data protection authority in the EU or the EEA. This provision is applicable provided that your Personal Information is processed by automated means and that the processing is based on your consent, on a contract which you are part of, or on pre-contractual obligations thereof.

Disclosures for residents of the USA

If you are a resident of California, you have certain rights and we aim to take reasonable steps to allow you to correct, amend, delete, or limit the

use of your Personal Information. This supplemental section, together with other relevant sections of the Policy, provides information about your rights and how to exercise them under the California Consumer Privacy Act and the California Privacy Rights Act (collectively, "CCPA"), the Colorado Privacy Act ("CPA"), the Connecticut Data Privacy Act ("CDPA"), the Delaware Online Privacy and Protection Act ("DOPPA"), the Iowa Consumer Data Protection Act ("ICDPA"), the Maryland Personal Information Protection Act ("PIPA"), the Utah Consumer Privacy Act ("UCPA"), the Virginia Consumer Data Protection Act ("VCDPA"), and any and all regulations arising therefrom. Unless otherwise expressly stated, all terms in this section have the same meaning as defined in the related state laws.

In addition to the rights as explained in this Policy, if you provide Personal Information as defined in the statute to obtain Services for personal, family, or household use, you have the right to submit requests related to your Personal Information once a calendar year. Note that there are circumstances when we may not be able to comply with your request such as when we are not able to verify your request or we may find that providing a full response conflicts with other legal obligations or regulatory requirements. You will be notified if it's the case.

(a) Right to know and right to access: You have the right to request certain information we have collected about you. Once we receive and confirm a verifiable request from you, we will disclose to you, to the extent permitted by law:

- The specific pieces of Personal Information we hold about you.
- The categories of sources from which Information about you is collected.
- The purposes for collecting, selling, or sharing your Personal Information.

You have the right to request that the Personal Information be delivered in a format that is both portable and easily usable, as long as it is technically possible to do so.

(b) Right to correct: You have the right to request that we correct your inaccurate Personal Information taking into account the nature of the Personal Information and the purposes of the processing of the Personal Information.

(c) Right to delete: You have the right to request deletion of your Personal Information.

(d) Right to opt-out of the sale and sharing: You have the right to opt-out of the sale of your Personal Information which may include selling, disclosing, or transferring Personal Information to another business or a third party for monetary or other valuable consideration.

(e) Right to consent to or limit the use of your sensitive personal information: You have the right to consent to the use of your Sensitive Personal information and to direct us to restrict its use and disclosure solely to what is essential for carrying out or delivering the Services in a manner reasonably anticipated by an average user, or for certain business objectives as specified by law. However, we do not use Sensitive Personal Information for any purposes other than those legally permitted or beyond the scope of your consent.

(f) Right to non-discrimination: You have the right to not be discriminated against in the Services or quality of Services you receive from us for exercising your rights. We may not, and will not, treat you differently because of your data subject request activity, and we may not and will not deny goods or Services to you, charge different rates for goods or Services, provide a different level quality of goods or Services, or suggest that we would treat you differently because of your data subject request activity.

(g) Shine the Light: California residents that have an established business relationship with us have the right to know how their personal information is disclosed to third parties for their direct marketing purposes under California's "Shine the Light" law, or the right to opt out of such practices.

To exercise any of your rights, simply contact us using the details below. After we receive and verify your request, we will process it to the extent possible within our capabilities.

How to exercise your rights

Any requests to exercise your rights can be directed to us through the contact details provided in this document. Please note that we may ask you to verify your identity before responding to such requests. Your request must provide sufficient information that allows us to verify that you are the person you are claiming to be or that you are the authorised representative of such person. If we receive your request from an authorised representative, we may request evidence that you have provided such an authorised representative with power of attorney or that the authorised representative otherwise has valid written authority to submit requests on your behalf.

You must include sufficient details to allow us to properly understand the request and respond to it. We cannot respond to your request or provide you with Personal Information unless we first verify your identity or authority to make such a request and confirm that the Personal Information relates to you.

Data analytics

Our Mobile Application and Services may use third-party analytics tools that use cookies, web beacons, or other similar information-gathering technologies to collect standard internet activity and usage information. The information gathered is used to compile statistical reports on User activity such as how often Users visit our Mobile Application and Services, what pages they visit and for how long, etc. We use the information obtained from these analytics tools to monitor the performance and improve our Mobile Application and Services. We do not use third-party analytics tools to track or to collect any personally identifiable information

of our Users and we will not associate any information gathered from the statistical reports with any individual User.

Privacy of children

We do not knowingly collect any Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information through the Mobile Application and Services. If you have reason to believe that a child under the age of 18 has provided Personal Information to us through the Mobile Application and Services, please contact us to request that we delete that child's Personal Information from our Services.

We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Mobile Application and Services without their permission. We also ask that all parents and legal guardians overseeing the care of children take the necessary precautions to ensure that their children are instructed to never give out Personal Information when online without their permission.

Do not sell my personal information

You have the right to choose not to have your Personal Information sold or disclosed by contacting us. Upon receiving and verifying your request, we will cease the sale and disclosure of your Personal Information. Be aware, however, that opting out of data transfers to our third parties might affect our ability to provide certain Services you have signed up for. We reserve the right to reject opt-out requests in certain situations as permitted by the CCPA, such as when the sale of Personal Information is required for us to fulfil legal or contractual duties.

Advertisements

We may display online advertisements and we may share aggregated and non-identifying information about our customers that we or our advertisers collect through your use of the Mobile Application and Services. We do not share personally identifiable information about individual customers with advertisers. In some instances, we may use this aggregated and non-identifying information to deliver tailored advertisements to the intended audience.

We may also permit certain third-party companies to help us tailor advertising that we think may be of interest to Users and to collect and use other data about User activities in the Mobile Application. These companies may deliver ads that might place cookies and otherwise track User behaviour.

If you would like more information about your choices to opt-in or opt-out of this data collection, you may also download the AppChoices app at [Digital Advertising Alliance's AppChoices app](#) to opt out in connection with mobile apps, or use the platform controls on your mobile device to opt out.

Social media features

Our Mobile Application and Services may include social media features, such as the Facebook and Twitter buttons, Share This buttons, etc (collectively, "Social Media Features"). These Social Media Features may collect your IP address, what page you are visiting on our Mobile Application and Services, and may set a cookie to enable Social Media Features to function properly. Social Media Features are hosted either by their respective providers or directly on our Mobile Application and Services. Your interactions with these Social Media Features are governed by the privacy policy of their respective providers.

Email marketing

We offer electronic newsletters to which you may voluntarily subscribe at any time. We are committed to keeping your e-mail address confidential

and will not disclose your email address to any third parties except as allowed in the information use and processing section or for the purposes of utilising a third-party provider to send such emails. We will maintain the information sent via email in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the email is from and provide clear information on how to contact the sender. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting us. However, you will continue to receive essential transactional emails.

Push notifications

We offer push notifications to which you may also voluntarily subscribe at any time. To make sure push notifications reach the correct devices, we use a third-party push notifications provider who relies on a device token unique to your device which is issued by the operating system of your device. While it is possible to access a list of device tokens, they will not reveal your identity, your unique device ID, or your contact information to us or our third-party push notifications provider. We will maintain the information sent via email in accordance with applicable laws and regulations. If, at any time, you wish to stop receiving push notifications, simply adjust your device settings accordingly.

Affiliate links

We may engage in affiliate marketing and have affiliate links present on the Mobile Application and Services for the purpose of being able to offer you related or additional products and services. If you click on an affiliate link, a cookie will be placed on your browser to track any sales for purposes of commissions.

Links to other resources

The Mobile Application and Services contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave the Mobile Application and Services and to read the privacy statements of each and every resource that may collect Personal Information.

Right to erasure

You have the right to request that we erase your personal data.

Should you wish to exercise your right to erasure under data protection law, you may do so from within the app's account & privacy screen under settings screen section by deleting your profile or sending a request to b4k-software@outlook.com and requesting your data be deleted.

We may require you to provide identification and further information if this action is asked for outside the Mobile application. Upon receiving a confirmation of your identity, we will send a full response within one calendar month confirming whether we will be able to comply with your request. If we cannot respond within that timescale, you will be given notice via the initial contact medium.

Information security

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorised access, use, modification, and disclosure of Personal Information in our control and

custody. However, no data transmission over the Internet or wireless network can be guaranteed.

Therefore, while we strive to protect your Personal Information, you acknowledge that (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and the Mobile Application and Services cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

As the security of Personal Information depends in part on the security of the device you use to communicate with us and the security you use to protect your credentials, please take appropriate measures to protect this information.

Data breach

In the event we become aware that the security of the Mobile Application and Services has been compromised or Users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the User as a result of the breach or if notice is otherwise required by law. When we do, we will send you an email, get in touch with you over the phone.

Changes and amendments

We reserve the right to modify this Policy or its terms related to the Mobile Application and Services at any time at our discretion. When we do, we will revise the updated date at the bottom of this page. We may also provide

notice to you in other ways at our discretion, such as through the contact information you have provided.

An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Mobile Application and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different from what was stated at the time your Personal Information was collected.

Acceptance of this policy

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Mobile Application and Services and submitting your information you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorised to access or use the Mobile Application and Services.

Contacting us

If you have any other questions, concerns, or complaints regarding this Policy, we encourage you to contact us using the details below:

b4k-software@outlook.com

We will attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by applicable data protection laws.

This document was last updated on May 1, 2024