

PRIVACY FACTORY LLC
PRIVACY POLICY
Last Updated: 07.12.2018

1. SCOPE OF THIS PRIVACY POLICY

This privacy policy statement (“Privacy Policy”) describes how Privacy Factory LLC (“ Privacy Factory,” “we,” “us,” or “our”) obtain, use, store, change, disclose, and delete our users’ (“you,” or “your”) personal data as it relates to Privacy Factory’s products, services, websites, mobile and desktop applications, and marketing practices. This Privacy Policy is a part of and is incorporated into the Privacy Factory LLC End User Agreement between Privacy Factory and you. We ask that you read this Privacy Policy carefully as it contains important information on how and why we collect, store, use, and share personal information, your rights in relation to your personal information and on how to contact us in the event you have a privacy concern or complaint.

If you have any privacy or personal data concern related to any of Privacy Factory’s products, services, or practices, please contact us at privacyfactory@gmail.com

Please review our other relevant policies and agreements:
https://privacyfactory.net/files/end_user_agreement.pdf

2. WHAT PERSONAL DATA WE COLLECT AND HOW WE COLLECT IT

A. IDENTIFIED PERSONAL DATA THAT YOU PROVIDE

The term “identified personal data” means any information relating to a recognized or recognizable natural person.

In a case of you provide us your identified personal data in a way of contacting us separately, we will be able to collect certain personal data, including the following:

- i. Email address — exclusively if you do provide us your email address for contacting you.
- ii. Any other information that you choose to provide to us by completing a web form, sending to us an email, online chat, forum postings, and any other similar means.

B. UNIDENTIFIED PERSONAL DATA THAT WE COLLECT AUTOMATICALLY

The term “unidentified personal data” means any information not directly relating to a natural person.

Upon your use of a Privacy Factory’s website and activation and/or use of a Privacy Factory app, we collect certain unidentified personal data from you, in each case only if applicable, including the following:

- i. IP address;
- ii. Browser type and operating system;
- iii. Device name, code, Manufacturer, and language locale;
- iv. Time zone, connection type, WiFi network name;
- v. Country; and
- vi. Privacy Factory website/app usage, including version used, activation date, and updates installed.

Personal data usage is regulated in accordance with Data usage regulations.

3. HOW WE USE PERSONAL DATA

We use your personal data on the following legal bases, and for the following purposes:

- A. Based on your consent, including:
 - i. Contacting you with offers and other marketing regarding Privacy Factory's products and services exclusively if you consciously have provided us any means for liaising you; and
 - ii. Accessing your device information relating to your use of Privacy Factory's websites and applications; and
 - iii. Analyzing and improving our products, services, and marketing.
 - iv. Providing you with support and troubleshooting services related to Privacy Factory's products and services
- B. For the purposes of our legitimate interests, or the legitimate interests of our other users and other third parties, including:
 - i. Analyzing and improving our products, services, and marketing, unless our actions in this regard require our specific consent;
 - ii. Discovering issues in our products, services, websites, and applications;
 - iii. Detecting and preventing fraud, illegal activity, and any other activity that infringes upon the legal rights of Privacy Factory, our other users, or other third parties;
 - iv. Carry out or exercise our rights and obligations arising from any orders.

4. WHEN AND WHY WE SHARE PERSONAL DATA

Considering that Privacy Factory does not collect, log, store any your identified or unidentified personal information, we do not share identified or unidentified personal information for other third parties.

In a case of you provide us your identified personal information in accordance with the Section 2 (A) of this Privacy Policy, we will be able to collect, store and share your identified personal information only in accordance with this Privacy Policy and applicable law.

5. WHERE AND HOW WE STORE AND TRANSFER PERSONAL DATA

We use appropriate physical, electronic, technical, and organizational measures to secure and protect your personal data to ensure a level of security appropriate to the risk. You should understand, however, that no safeguards are guaranteed to prevent unauthorized disclosure and/or use of personal data. Because of that, we cannot guarantee or warrant that your personal data will never be exposed. We use third-party service providers globally to store and transfer personal data. We work with our third-party service providers to put in place adequate protections to ensure the security of personal data when it is stored and transferred.

6. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You can limit your sharing and our use of your personal data when it is based on your consent. For example, you can control our use of cookies by using the settings of your internet browser. Please be aware that your limit on our use of personal data may cause our websites and applications to appear and function not as intended. You can also limit our use of your personal data for our marketing purposes.

If the laws of some countries apply to you, you may have the right to do the following:

- i. Request access to your personal data which you do provide us in accordance with the Section 2 (A) of this Privacy Policy;
- ii. Request correction of your personal data, which you do provide us in accordance with the Section 2 (A) of this Privacy Policy, or supplementation of your personal data for completeness;
- iii. Request erasure of your personal data under certain circumstances, such as when the personal data is processed based on your consent;
- iv. Request restriction of processing of your personal data under certain circumstances;
- v. Request transfer of your personal data to another entity under certain circumstances, such as when the personal data is processed based on your consent and the processing of your personal data is carried out by automated means;
- vi. Withdraw consent to the processing of your personal data where the processing is based on your consent, without affecting the lawfulness of processing based on consent before its withdrawal; and
- vii. File a complaint with your local supervisory authority.

RIGHT TO OBJECT

If the laws of some countries apply to you, you may have the “right to object” to our processing of your personal data when such processing is based on our, or a third party’s, legitimate interests. We will stop processing your personal data, unless:

- i. We demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms; or
- ii. Such processing is necessary for the establishment, exercise or defense of legal claims.

If you object, we will stop processing your personal data for direct marketing purposes.

In order to request to exercise any of your rights, we may require you to provide us with detailed information about your request. Your rights are also subject to certain other limitations contained in the applicable law.

7. HOW LONG WE STORE PERSONAL DATA

We do not store any your identified or unidentified personal information.

In a case of you provide us your identified personal information in accordance with the Section 2 (A) of this Privacy Policy, we will be able to process and store your identified personal information as long as required by the purpose they have been collected for. Therefore:

- i. Identified personal information collected for purposes related to the performance of a contract between Privacy Factory and you shall be retained until such contract has been fully performed.
- ii. Identified personal information collected for the purposes of the Privacy Factory's legitimate interests and compliance with a legal obligation to which Privacy Factory is subject shall be retained as long as needed to fulfill such purposes.

Privacy Factory may be obliged to retain identified personal information for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, identified 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 expiration of the retention period.

8. CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy (and/or other applicable policies and Addenda) as the applicable laws, relevant technologies, and our data processing practices change. We will notify you of changes to this Privacy Policy (and/or other applicable policies and Addenda) by posting the updated policy on our website and in our applications and other products and services. The changes to this Privacy Policy (and/or other applicable policies and Addenda) shall become effective upon such posting (as indicated by the date following "Last Updated:" at the top of this Privacy Policy and/or other applicable policies and Addenda), or as otherwise required by applicable law. We encourage you to review this Privacy Policy (and other applicable policies and Addenda) on a periodic basis.