

# Privacy Policy

Last updated: December 8, 2020

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

## Interpretation and Definitions

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Garny Apps LLC, 7-109-65B, Timiryazeva str., Minsk, 220035, the Republic of Belarus.
- Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- Country refers to: Minsk, the Republic of Belarus
- Device means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- Personal Data is any information that relates to an identified or identifiable individual. Includes GDRR and CCPA. GDPR means Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data (General Data Protection Regulation); CCPA means the California Consumer Protection Act of 2018.
- Service refers to the Website or App.

- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- Third-party Social Media Service refers to any website or any social network website through which a User can log in or create an account to use the Service.
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Website websites developed by us.
- App refers to mobile applications developed by us and available through Google Play or Apple App Store.
- You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## Children's Privacy

Our Services are not directed to anyone under the age of 13 ("Children"). We do not knowingly collect personal information from anyone under the age of 13. If you are a parent or legal guardian and you are aware that your Children has provided us with Personal Data, please contact us at [spectr.support@garny.io](mailto:spectr.support@garny.io). If we become aware that a child under 13 has provided us with Personal Information (as defined by the US Children's Online Privacy Protection Act), or that a child under the age of 16 has provided us with Personal Data (as defined by the EU GDPR), we take steps to remove that information as soon as possible.

## Collecting and Using Your Personal Data

### Types of Data Collected

#### Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- First and last name
- Username
- Email address
- Usage Data

#### Usage Data

Our Apps may have access to photos and videos on your device if you grant permission, but we don't collect them, all of them are stored locally on your device. We may collect data from Your Device information, which directly or indirectly identifies You, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, Google Advertising ID, Apple ID for Advertising, operating system, mobile device carrier information. We may collect and analyze the way you interact with our Services and other related information. Your information may be kept in an identifiable format, or in an aggregate format, which means that You cannot reasonably be identified from it. We may collect the information about You when You use the Services and the specific features thereof, including the following: (a) Information about Your name, email address and other similar contact data when You interact with Us such as when You report a problem, contact or communicate with Us and share this information; (b) We may collect certain device data and electronic identifiers such as Your mobile operating system details (version), model and type of Your Device (phone/tablet); (c) advertiser IDs (IDFAs in case of an Apple device or Android Ad IDs in case of an Android device); (d) other identifiers may include IP addresses, Android ID for Android platform; When You will be using the Application, We will collect certain information automatically about your activity and the way how you use our apps and/or services. This will include certain technical data about Your Device, carrier as well as other technical data related to the use of Your Device. We may collect Your geolocation data (ONLY with Your consent) via the device's cellular, Wi-Fi or GPS, We do so to provide You with Our location related products and services. The ways how We receive Your information include, but are not limited to: (i) by using Our Services or visiting Our websites, (ii) registration for Services, contests and special events; (iii) accessing Services using a third party ID, such as social networking sites or gaming services; (iv) subscribing to newsletters; (v) purchasing a product or services within the Apps; (vii) requesting technical support; and (viii) otherwise through use of Our Services where personal data is required for use and/or participation. You may provide some of Your information directly, some of it depending on how You interact with the Apps, receiving performance reports or usage data from the Apps running on Your Device. We may use and combine Your information across different Apps used by You. Please note, that We may use the elements of Your information and combine it with other information which We legally possess.

## **Tracking Technologies and Cookies**

Our third party SDKs (advertising networks) may use cookies and similar technologies, to provide and personalize our Services and to provide targeted advertisements. Third parties who advertise on our Services may use cookies or similar technologies such as tracking pixels in their advertising. These technologies operate either by: (i) placing a small file, which stores some information on Your Device; and/or (ii) by accessing information on Your Device. These technologies allow the collection of data, such as Your Device's model, operating system and screen size, the other applications installed on Your Device, and information about how You use our Services. We may use Your information to send You direct marketing and promotional materials relating to our Services or related products, for example sending You communications (including by email) for these purposes on Our, or a third party's behalf. If you do not want Us to use Your information in this way please let us know by contacting Us at [spectr.support@garny.io](mailto:spectr.support@garny.io). We may also allow third parties to display advertisements in the Apps or other apps or use Your information for the purpose of advertising and direct marketing. These third parties may use technologies to collect data about users, including location data, to help them produce relevant ads and content, analyze and measure effectiveness of the ads.

## **Use of Your Personal Data**

The Company may use Personal Data for the following purposes:

- To provide and maintain our Service, including to monitor the usage of our Service.
- To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.

We collect Your information to analyze it and improve our Services. Help you efficiently access Your information after you sign in and store it so you will not have to re-enter it when you want to use Services next time. For advertising of our Services and products; enforce Our terms, conditions and policies and personalize Your experience. To improve, test and monitor our Services to provide You with the most convenient features. Analyze Your activity information to develop and test new products and features, as well as fix technology issues. Monitor metrics to provide personalized content and information to You and others, which could include online ads or other forms of marketing Analytics We use Our own analytics as well as third-party analytics tools to help us measure traffic and usage trends for the Service. We use analytical information for supporting business analysis and operations, business intelligence, product development, improving the Services, personalizing content, providing advertising, and making recommendations. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User. Advertising We may use Your information in connection with advertising. We may also use Your information to help a third party deliver advertisements that are tailored to You based on a determination of Your characteristics or interests. Advertisers on mobile devices sometimes use advertising (or ad) identifiers to enable and optimize their advertising. Ad identifiers are non-permanent, non-personal device identifiers such as the Android advertising ID and/or Apple's ID for advertising (IDFA). You can choose to prevent Your Device's ad identifier being used for interest based advertising, or You can reset Your Device's ad identifier, by changing the settings of Your Device. We will also use the information about Your particular Device in order to show You advertising which works properly on that Device, or to measure the effectiveness of Our advertising campaigns. We may also retain information about how many times You have seen a particular advertisement so We can stop You from seeing it too many times. When We advertise our Services in mobile applications or media published by other companies, We may use various third party advertising partners, including ad exchanges, ad networks and ad servers.

We may share your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- For Business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- With Business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts

on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

Only aggregated, anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties in the ways that are described in sections above. We sometimes cooperate and use third parties, such as advertising networks, for the purposes of developing and displaying the content, advertising and offers specifically tailored to Your interests and location. We may share Your information with these third parties by inclusion into Our Apps a bit of a special computer code, enabling them to have a limited access and collect the part of Your information needed to perform their functions. They use Your information in accordance with their privacy policies, but in any case they are not permitted to share or otherwise use Your information for any other purposes than those indicated in this Policy. In addition, We may share aggregated information, including Your information, under any of the above circumstances, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other legitimate business purposes. Please note, that such aggregated information will not include any information, which allows third parties to identify You. We may need to transfer Your information to other group companies or service providers in countries outside EEA. This may happen if Our servers or suppliers and service providers are based outside the EEA, or if You use our services and products while visiting countries outside this area. We may also share Your information with partner organizations We've chosen carefully, so they can contact You about their products and services. The information that We collect from You may be transferred to, and stored at, a destination outside of Your country and the EEA and, in particular, the USA, which may have different or less protective privacy laws than those in Your country. Your Information may also be processed by any service providers appointed by Us who operate outside the EEA and their staff, and/or Our own staff based outside of the EEA. By submitting or permitting Us to collect Your information, You agree to this transfer, storing or processing outside of the EEA. Your information transferred will be treated in accordance with the requirements of applicable laws and this Policy. We may disclose User Provided and Automatically Collected Information: as required by law, such as to comply with a subpoena, or similar legal process; 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; with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement. if we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via a prominent notice in our Application of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

## **Legal Bases (GDPR-only)**

The legal bases for processing and collecting this Personal Data and information for the above purposes, may be one or more of the following:

1. Your consent
2. Development, management, improvement of our business
3. Performing under the Terms of Use or other contracts. Your request will be processed prior
4. Retaining invoice information of our paid subscribers (to comply with financial regulations)

## **Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

**Security** We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

**Data Retention Policy, Managing Your Information** We will retain User Provided data for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected information for up to and thereafter 24 months may store it in aggregate. If you'd like us to delete User Provided Data that you have provided via the Application, please contact us at and we will respond in a reasonable time [spectr.support@garny.io](mailto:spectr.support@garny.io). Please note that some or all of the User Provided Data may be required in order for the Application to function properly.

## **Modification and deletion of information**

You can stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request to opt-out via email, at [spectr.support@garny.io](mailto:spectr.support@garny.io). Contact us If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at [spectr.support@garny.io](mailto:spectr.support@garny.io).

## **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

## **Disclosure of Your Personal Data**

### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **Law enforcement**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Other legal requirements**

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## **Security of Your Personal Data**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## **Your California Privacy Rights (California's Shine the Light law)**

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if you are a California resident, You can contact Us using the contact information provided below.

## **California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)**

California Business and Professions Code section 22581 allows California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

## **Links to Other Websites**

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, You can contact us by email: [spectr.support@garny.io](mailto:spectr.support@garny.io)