PICTONIKA - PRIVACY NOTICE

Last update: August 14, 2018

Sergey Starkov ("Pictonika", "we", "us", "our") provides users with an app designed to edit and perfect photos, create selfies and share their creations through social media and email (the "App"). This Privacy Notice (the "Notice") describes the how we collect and use your personal data in our App. It also describes the rights and options available to you with respect to your personal information.

WHO WE ARE

Pictonika is the data controller of the personal data we collect via the App and use and share as further described below.

CONTACT US

If you have any questions or requests concerning your personal data or about our privacy practices and policies, you may contact us at support@pictonika.com

PERSONAL DATA WE COLLECT

When you use our Apps, we will record and collect the following information (collectively, "Analytical Information"):

- 1. **Unique advertising identifiers**, We use it for advertising as we further describe in this Notice.
- 2. **IP address** from which you access the App. We can also identify your geo-location via your IP address.
- 3. **Device information**, including device type, operating system version, time zone and your preferred languages.
- 4. **Usage information**, such as the time and date you accessed the App, the features you used, your preferences and for how long you use the App every time you launch it.

If you choose to subscribe to our PREMIUM subscription or to purchase items through the App, we will collect the information provided by Apple on the respective invoice ("Purchase Information").

The overall personal data outlined above will be referred to as the "Information".

SOURCE OF PERSONAL DATA

We do not collect the Information we disclosed above only by ourselves. We obtain some of it from the following sources ("Vendors"):

- AppsFlyer, Inc. AppsFlyer's privacy policy is available <u>here</u>.
 You can opt-out of AppsFlyer Analytics tracking by sending an email to: privacy@appsflyer.com;
- 2. **Firebase** (Google); Google's privacy policy is available here.
- 3. **AdMob** (Google); Google's privacy policy is available here.

The Vendors may also collect your Information through their designated code incorporated in our Apps. We use their services for the purposes set forth below.

HOW WE USE PERSONAL DATA

We use your Information for the following purposes:

- 1. Maintain and improve our Apps;
- 2. Develop new services and features;
- 3. Adapt the App, its features and functionality to users' preferences;
- 4. Analysis of marketing efficiency.

Subject to your informed consent, in the App we will use the Analytical Information we obtain to serve you with advertisements to products and services that we believe may suit your interests.

WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS

Except as noted below, we do not share your personal information with third parties unless you give us your permission. We require that these parties agree to process such information based on our instructions and in compliance with this Notice. We only share personal information with third parties in the circumstances listed below:

- 1. In order to provide products or services you have requested;
- 2. If we are bound to disclose your information by a judicial order or by a governmental or regulatory authority acting within its legal authority, we will comply and share the Information;
- 3. If we become involved in a merger, acquisition, or any form of sale of some or all of our assets, we will provide notice before personal information is transferred and becomes subject to a different privacy notice.

4. We may share with third parties certain pieces of aggregated, **non-personal** information, such as the number of users who searched for a particular term for example, or how many users clicked on a particular advertisement.

DATA RETENTION

We retain personal data as long as we need it for the purposes for which it was obtained or until you ask to delete it. If you ask us to delete the Information, we may still have to retain it to comply with our legal obligations, resolve disputes and enforce our agreements.

SECURITY

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed, and you cannot expect that the Service will be immune from information security risks.

CHANGES TO THIS PRIVACY NOTICE

From time to time, we may change this Notice. If you are a registered user, we will provide you notice of such changes through the App. In case of legal requirement, we may also introduce immediate changes to the Notice and require that you accept them. In any event, if you do not consent to the amended Notice, we may terminate your user account. The latest version of the Notice will always be accessible on the App.