

i.creation 2020 Ltd Privacy Policy

PRIVACY NOTICE

Last updated July 30, 2022

Thank you for choosing to be part of our community at i.creation 2020 LIMITED ("Company", "we", "us", "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at andy.jackson@i-creation.co.uk

When you use our mobile application, as the case may be (the "App") and more generally, use any of our services (the "Services", which include the App), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our App), as well as, any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

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1. WHAT INFORMATION DO WE COLLECT?

Information collected through our App

In Short: We collect information regarding your mobile device, when you use our App.

If you use our App, we also collect the following information:

- Mobile Device Access. We may request access or permission to certain features from your mobile device, including your mobile device's camera, storage, sensors,
- and other features. If you wish to change our access or permissions, you may do so in your device's settings.

This information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes.

We collect facial data by using face tracking to create AR effects within the App. The only use of this information is to provide valuable user features. None of the information collected by the camera or face tracking ever leaves the user's device. We do not share information with third parties, do not store or process in any other way the data which we accessed and used via face tracking.

As the App functionality is based on face detection, in order to use our App You need to enable your camera. However, all images taken by your mobile phone camera shall be processed solely on your device and shall not be sent to our servers, i.e. we do not have access to such images (we will not collect, share or store them).

2. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We do not collect any personal information. Then only information we collect is in relation to the number of people using the App, when they use it and which functions they use. This helps us to improve Apps for future users. We will never collect any personal information without your consent, and we are committed to complying with laws, to provide you with services and protect your rights while fulfilling business obligations.

In future, we may process or share your data that we hold based on the following legal basis:

- Consent: We may process your data only if you have given us specific consent to use your personal information for a specific purpose.
- Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

3. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We do not collect, transfer or store any personal data about you. We may transfer, store, and process information about your use of the app in countries other than your own.

Our servers are located in the UK. If you are accessing our App from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

4. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We do not collect or save any personal data about you. We keep information about your use of the App for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

5. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your use of the App at any time.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>

6. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

7. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the App, you have the right to request removal of unwanted data that you publicly post on the App. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the App, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

8. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

9. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Andrew Jackson, by email at andy.jackson@i-creation.co.uk, by phone at +44 1782 829850, or by post to:

I-CREATION 2020 LIMITED

C/O D P C Stone House

55 Stone Road Business Park

Stoke-on-Trent

Staffordshire

ST4 6SR

United Kingdom

If you have any further questions or comments, you may also contact us by post at the following corporate address:

I-CREATION 2020 LIMITED

C/O D P C Stone House

55 Stone Road Business Park

Stoke-on-Trent

Staffordshire

ST4 6SR

United Kingdom

Phone: +44 1782 829850

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