

PRIVACY POLICY

Last Updated: Novemeber 29, 2024

This Privacy Policy describes the collection and processing of information about you that can directly or indirectly identify you (the “**Personal Data**”) carried out by the mobile app “Picto”.

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE Picto.

Please read this Privacy Policy carefully as it contains important information about the following:

- How do we process your Personal Data?
- When can we share your Personal Data?
- How long do we retain your Personal Data?
- Do we use automated decision-making or refer to the automated profiling?
- What rights do you have?

We may update this Privacy Policy from time-to-time to keep it in conformity with the relevant legislation, including the Regulation of the European Parliament and of the Council (EU) 2016/679 (the “**GDPR**”) and California Consumer Privacy Act 2018 (the “**CCPA**”). We will keep you informed about the changes to our Privacy Policy. If we make any major changes to our Privacy Policy and will need your explicit consent for further processing of your Personal Data, we will request your consent or your renewed consent (in case it was obtained previously).

Contact Details of Data Controller:

Name: CREAT1VE

Address: Poland, Wrocław, Al. Armii Krajowej 45, 50-541

E-mail: mail.creat1ve.co@gmail.com

HOW DO WE PROCESS YOUR PERSONAL DATA?

We use your Personal Data for the purposes and on the legal bases indicated below:

Purpose of the processing	Personal Data	Legal basis for the processing
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<p><i>To ensure proper use of Picto, including the ability to monitor and troubleshoot technical issues</i></p>	<ul style="list-style-type: none"> ● Technical data such as IP address, device ID, general location data, device model, date and time of access (the “Technical Data”) ● Usage experience, i.e. information about your use of Picto (the “User Data”) 	<p>Terms of Use * <i>Without providing this data you will not be able to use Picto</i></p>
<p><i>To manage and optimise users’ experience by improving our knowledge of our users</i></p>	<ul style="list-style-type: none"> ● Technical Data ● User Data 	<p>Our legitimate interest in evaluating and creating statistics on the use of Picto and your interest in the Picto updates which will be tailored to your needs</p>

Payment Data

Your payment data is processed by the app store which you downloaded Picto from.

WHEN CAN WE SHARE YOUR PERSONAL DATA?

We can share your Personal Data with third parties only in the cases listed below:

With our partners who help us support the Picto: We may have partners that help us to make Picto better, including analytics and advertising partners which may process your Device ID and some User Data for analytical and advertising purposes respectively.

The list of our analytics and advertising partners:

- **Adapty.** Adapty is a service for analytics and growing mobile in-app subscriptions
Address: Adapty Tech Inc., 2093 PHILADELPHIA PIKE #9181 CLAYMONT, DE 19703. [Privacy Policy of Adapty Inc.](#);

- **Appsflyer.** Appsflyer is a SaaS mobile marketing analytics and attribution platform provided by AppsFlyer. Address: to the attention of Legal Team/Data Protection Officer, 14 Maskit St., Herzliya, Israel, 4673314, [Privacy Policy of AppsFlyer, Inc.](#);

- **Amplitude.** Amplitude is a SaaS mobile marketing analytics and attribution platform provided by Amplitude, Inc. Address: 201 3rd Street, Suite 200, San Francisco, CA 94103, [Privacy Policy of Amplitude, Inc.](#);

- **AppMetrica.** AppMetrica is mobile analytics service provided by Yandex, LLC. Address: Finnish entity, Global DC Oy, a company incorporated under Finnish law, with an office registered at Moreenikatu 6, 04600 Mantsala, Finland. [Privacy Policy of AppMetrica.](#)

- **Facebook SDK.** Facebook SDK is a set of marketing and analytics software components provided by Meta Platforms, Inc. Address: 1601 Willow Road ,Menlo Park,CA,94025. [Privacy Policy of Meta Platforms.](#)

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your Personal Data for no longer than it is necessary to fulfill the purposes specified in the section “How do we process your Personal Data” or for a longer period to comply with our legal obligations, resolve disputes, establish and defend legal claims.

DO WE USE AUTOMATED DECISION-MAKING OR REFER TO THE AUTOMATED PROFILING?

We neither use automated decision-making nor refer to the automated profiling.

WHAT RIGHTS DO YOU HAVE? Rights of EU residents:

(1) **The right of access** to your Personal Data meaning that you can receive a copy of the Personal Data that we hold about you, as well as other supplementary information.

(2) **The right to rectification** of your Personal Data which is incomplete or inaccurate.

(3) **The right to erasure** of your Personal Data meaning that you can ask us to delete or remove your Personal Data in certain circumstances. Note, that we can retain your Personal Data as necessary to comply with our legal obligations or resolve disputes. If we have no grounds to continue processing your Personal Data, we will delete or remove it and notify you about such deletion or removal.

(4) **The right to restrict processing** of your Personal Data if (a) the accuracy of the Personal Data is contested by you, (b) the processing is unlawful and you oppose the erasure of the Personal Data, (c) we no longer need the Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims, and (d) you have objected to processing pending the verification whether the legitimate grounds override this.

(5) **The right to data portability.** Please note that this right only applies to information that we processed based on your consent or Terms of Use.

(6) **The right to object to the processing** of your Personal Data where we are relying on a legitimate interest and there is something about your particular situation that makes you want to object to the processing on this ground. We will no longer process the Personal Data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

(7) **Right to withdraw consent** at any time where we are relying on the consent to process your Personal Data. If we have no other grounds for processing your Personal Data, after you send us a request to withdraw consent, we will stop processing your Personal Data that we were processing under your consent.

We will address your request as early as possible and no longer than within 1 (one) month. Please note that this period may be extended by 2 (two) further months where necessary, taking into account the complexity and number of the requests. In this case, we will inform you of the extension within 1 (one) month of receipt of your request and will explain you the reasons for the delay.

Rights of California residents:

(1) **The right to opt out.** Under the CCPA each California resident can request business stops

selling Personal Data to third parties.

Do we actually “sell” Personal Data? We do not, and will not, provide your Personal Data in direct exchange for money. Therefore, in the literal sense, we do not sell your Personal Data.

(2) **Other rights.** You also have a right to be informed about what categories of Personal Data we are collecting: you can request us to disclose what Personal Data we have collected in the past 12 (twelve) months and right to get a free copy of your Personal Data disclosed in a readily usable and readable format. You can also request us to delete the Personal Data we have collected in the past 12

(twelve) months. We will not discriminate against you for exercising any of your rights granted under CCPA.

Mandatory Verification: As required by CCPA we will need to verify your identity before processing your request. In order to verify your identity, you will be asked to log in to your account or (if you do not have an account) we will try to match the information you provided with the information we handle about you. In certain

circumstances, we may decline the request, mainly where we are unable to verify your identity, for example, if you have requested us to delete your Personal Data.

As required by CCPA we endeavor to respond to a verifiable request within 45 (forty-five) days of its receipt. If we require more time (up to 90 (ninety) days), we will inform you of the reason and extension period in writing. We will deliver our written response by e-mail.

How to exercise any of your rights? You may exercise your rights by sending a relevant request to the e-mail indicated in the contact details.

If you have any comments about how we process your Personal Data, please let us know and we will consider your claim. If you are not satisfied with our response to the complaint, you have the right to file a complaint with the competent authority.

AGE LIMITS

We do not knowingly collect or solicit your Personal Data to anyone under the age of 13 (16 – in European Economic Area) or knowingly allow such persons to use Picto. If you are under the age of 13 (or 16, where applicable), please do not provide any Personal Data to us. If we learn that we

have collected Personal Data about a child under the age of 13 (or 16, where applicable), we will delete that Personal Data as soon as possible. If you believe that we might have any Personal Data from or about a child under the age of 13 (or 16, where applicable), please contact us at the e-mail indicated in the contact details.