

# Privacy Policy

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A brief summary of the Policy:

We collect Users' data. This data can be personal or non-personal.

All User's data is collected directly from Users (when the User contacts Our support center), from Third parties (data from third-party accounts used for authorization or purchase), or collected automatically (User device data, identification and data about User actions in Service).

All data is collected on a legal basis. We use such basis as contract obligations, legitimate interest, or User consent (such consent can be withdrawn at any moment).

The collected data is used for Service maintenance. Sometimes we share that data with Third parties (for analytics or ads). All purposes of data processing are stated in the full Policy text (below).

If We need to share Users' personal data with Third parties for new purposes that were not stated in previous User consent, We will collect a new User consent with new purposes, and only after that will We share that data.

All data is stored for a minimal amount of time, which is enough for Us to maintain Service and execute all Operators' obligations.

To obtain further details about the processing of User personal data, we kindly invite you to carefully review the comprehensive Policy text provided below. Alternatively, you can contact us via email at [legal@wallpaperscraft.com](mailto:legal@wallpaperscraft.com), ensuring that you write "Question about personal data processing" in the subject line. Rest assured, we will promptly address your inquiries.

The comprehensive Policy text is below:

## Terms and definitions

Personal data - any data about User, that identifies or allows to identify User as a person, either directly or indirectly. When connected to an individual, information such as their name, last name, contact number, and email address can be classified as personal data.

User - a person who has achieved the necessary age for using the App legally and for giving consent to his personal data processing by himself, according to age restriction rules and applicable laws.

Service - a combination of the App, databases, and other technical elements that provide Users with access to content.

App - Wallcraft Wallpapers mobile application, acquired from the official store, which provides Users with access to the Wallcraft Service.

Data processing - a series of actions, either simple or complex, that encompass the collection, analysis, sharing, storage, anonymization, and deletion of data. In the Policy we use the "processing" term for automatic processing only because the Operator does not process personal data in any other way.

Operator - a person or company that processes Users' personal data on a legal basis.

Anonymized data - information that has been irreversibly altered to remove any direct or indirect links to a specific individual. This results in a dataset that undeniably belongs to a certain user, yet eliminates the possibility of identifying exactly who that user is.

What personal data are we collect

While providing Users with access to our Service, We collect certain data about Our Users. That data could be used for User identification. All collected data divided according to the way of collecting on:

Data shared by User

While using the Service User can contact Us for some reason: contact support, fill a claim, enquire terms and rules, etc. We access all data that User has provided to Us in that appeal. That data can contain name, email, phone number, contact information, photo, User ID etc.

Data which was collected automatically

While accessing the Service User device, it automatically transmits to Us certain data because this data is necessary for Service maintenance, advertisement system maintenance, and effectiveness analysis. The list of automatically collectable data is wide and can include (but not limited to): name and version of OS, IP, device IDs, bundle ID, App version, device information (type, screen resolution, model, brand, etc.), advertisement IDs, data about other apps on the device, device language, time and date, device geolocation (approximate), User in-app activity records and data, User pseudoID, and other data. All assignable identifiers are stored on the User device, so if the User removes the App, all identifiers are reset. If the User downloads the App again, he will be assigned new identifiers.

Data shared by third parties

While using the Service, User is able to make a payment or to authenticate using an “Google” account. That way we access some information from third parties that were used for that procedure. That information is shared under terms of third parties’ privacy policy, so You need to contact such a third party to restrict such data sharing. Data shared by third parties can be such as (but not limited): email, name, contact data, phone number, photo, other data from User’s profile in the third party’s account.

How do We use User data

Any data processing and use is based on legal basis only. Legal basis for data processing can be:

Personal data processing for executing contract obligations. Contract obligations can be a legal basis, for example:

Processing for Service maintenance, for technical support, for App updating, for consideration of complaints and appeals, for Content policy and Market rules compliance, for selection of device-compatible content , localisation setting, etc.

Processing of Personal data is necessary to fulfill legitimate interests that do not infringe upon the rights and freedoms of Users. This processing cannot be done without using the minimum amount of necessary data. Legitimate interests may include, but are not limited to, the following purposes:

Processing of user data for security purposes, analytics of the Service's performance, studying User behavior, identifying opportunities for Service improvement, analyzing advertising effectiveness, tracking content trends, collecting publication statistics, and conducting marketing research.

Processing of Personal data by Users is carried out solely on the basis of their voluntary and informed consent. This consent may at any time be altered, withdrawn, or not given at all. However, it is important to note that the lack of consent for data processing will not hinder the User's access to the Service. It will only limit the User's ability to receive personalized advertising offers and content collections based on their data. The list of processing purposes for which User consent is required may include, but is not limited to:

Processing for the purpose of providing personalized content, provision of personalized advertising, provision of advertisements on the basis of the territorial location of the User, provision of advertisements in the language of the User, analytics of Users interaction with advertisements, creation of a personalized User's advertising profile, and analysis of Users activity in the web for advertising purposes.

How do we share Users data to third parties

In cases expressly provided for in the Policy, we may transfer the personal data of Users to third parties. Such third parties may be (but are not limited to):

Our affiliates;

Service providers performing certain activities on our behalf;

Our successors in case of liquidation or reorganization of the company;

State and other bodies requesting data from Users on a legal basis;

Also, we may transfer non-personal User data (which does not contain information that can identify the User as a specific person) to third-party companies for the purposes of advertising, analyzing, and improving the quality of the Service. In such transfers, reasonable safety requirements are required from third-party recipients. We do not share Personal data and non-personal data received from Users at the same time.

Security measures

When processing a User's Personal data, We comply with all reasonable security requirements that can prevent loss, leakage, theft, unauthorized access, and other illegal actions.

However, it is important to note that no system can provide a 100% guarantee of data safety on the network. Additionally, we cannot guarantee that all third parties who receive User data from us or through their own privacy policies will comply with the necessary security measures.

User data storage

When processing Users' Personal data, we strive to keep it to a minimum and for the shortest amount of time necessary. We will delete all User data as soon as it is no longer needed for the purposes outlined in the Policy or upon receiving a request from the User to delete his personal data. If a User chooses to use the Service again, any previously deleted data will be replaced with new data.

In certain cases, we may retain User Personal data for a longer period than necessary to fulfill our Service obligations in connection with the consideration of User communications or complaints, legal disputes, and other important matters.

In this case, the information is processed only for declared purposes that prevent its deletion. As soon as the reasons preventing deletion cease, we will delete such information about the User as soon as possible.

#### Processing of children Personal data

We knowingly do not process the Personal Data from anyone under 13 years of age (or the age required by applicable law for us to obtain consent from each User for processing their Personal Data).

In accordance with the User Agreement and the age limit of the Service, we consider each User of the Service an individual who has reached the minimum age required to give consent to Personal Data processing in accordance with applicable legislation. In the event that we become aware that the person using the Service has not reached the age required by applicable law, we will promptly delete all Personal Data that we have processed during the period when we were unaware of the User's age.

#### Policy changes

Periodically, We may make changes to the Policy on the basis of a unilateral decision. You can learn about such changes from a notice about the date of the last change at the beginning of the Policy or from a notice in the App.

In case the User does not agree with the current Policy in its entirety or in part, or does not agree with the updates in its entirety or in part, such User should stop using the Service and delete the Application, and refrain from using the Service in the future until the terms of the Policy and User Agreement are acceptable to such User.

#### Cross Border data transfer

We may transfer Personal data of our Users across borders. Such transfer shall be subject to all legal requirements and restrictions that guarantee an adequate level of protection of User's Personal data. All the data we have gathered and shared with outside parties is automatically gathered and does not, by itself, facilitate the User's identity. Information about the User that we obtain from third parties shall be transmitted in compliance with all necessary security requirements, which shall be established by the rules for processing the personal data of each such third party. The information provided by the Users themselves shall not be transmitted across borders to any third parties.

#### User has right to:

The User has the right to request the Personal Data that We have collected, including the purpose of the collection, the period of storage, and the third-party recipients of such information. For that, the User needs to email your request to [legal@wallpaperscraft.com](mailto:legal@wallpaperscraft.com).

The User may update Personal Data collected by Us. Clarification may be made by requesting the same email address.

The User can request the deletion of all data that is associated with his Account by sending an email with a delete request.

The User has the right to demand that the processing of his Personal data be stopped and that the processing of his Personal data be prohibited.

The User may withdraw his consent to the processing of Personal data via email request. However, please note that after such a request is received, certain functionalities of the Service may become unavailable, and all information related to the account will be lost.

#### Contact information

For any questions regarding the processing of App Users Personal data, please contact Us for clarification. For that, you need to email [legal@wallpaperscraft.com](mailto:legal@wallpaperscraft.com), indicating in the subject line of the letter "a question on processing personal data". We will respond to your question promptly.