

Privacy Policy

Smart Media Internet Marketing LTD. ("Smart Media", "we", "us", or "our") values your privacy. In this Privacy Policy ("Policy"), we describe how we collect, use, and disclose information that we obtain about visitors to our website, users of our mobile application (the "App"), and the services available through our Site and/or App (collectively, the "services").

This Policy shall supplement our End User License Agreement (the "**Agreement**"), along with any supplemental guidelines terms of service and policies provided by us from time to time, all incorporated herein by reference.

Please read this privacy policy carefully. By registering, downloading, installing, accessing, activating or otherwise using the service or interacting with us on our services, you are agreeing to the terms of this privacy policy, including without limitation to the collection and processing of your received information as set forth herein. If you disagree with any term set forth herein, you may not register, download, install, access, activate or use the service or interact with us on our app, and you are obliged to immediately uninstall or erase the software from your device.

1. What kind of information we may collect

Contributors of Received Information:

When users register, download, install, access, activate or otherwise use the Service or interact with us on our App, Received Information may be received, processed and retained from user and devices the user may use in interactions with the Service.

"Received Information" may include any of the following: geolocation, IP address, or device identifier, device manufacturer and type, device and hardware settings, ID for advertising, ad data, operating system, operator, IMSI (international mobile subscriber identity), certain information regarding contacts contained in user device phone books ("Contacts"), phone number, connection information, screen resolution, usage statistics, device log, system files and event information, incoming and outgoing calls and messages, times and date of calls, duration of calls, behavioral information, version of the Software used, and other information based on You agree that you will exercise caution and common sense if you provide us with or let us collect or receive information, including Received Information, about someone else (including Contact information), and you hereby confirm that it is not false and that it will not corrupt or disrupt the Service, and that you have the right to provide or let us collect, receive, use and share such information according to the terms of this Privacy Policy and our Terms of Service. Furthermore, by using our recording call feature (currently not available), which allows you to save and access certain recordings of calls and other telephone communications that you participate in, you confirm that you informed all participants of such recorded calls of your use of the recording call feature prior to making such recordings, and that all consents and approvals for the recording of the call, as necessary or advisable under applicable law, have been obtained.

How we use the Data:

Data/names may also be associated with a phone number through our name/data tagging functionality, which allows a user who receives a call from a phone number which is not associated with data or a name in our resources to indicate the data/name to be associated with that number, we may also utilize this function on the app recording list view. This data/name will only be associated with a number through the name/data tagging functionality if a sufficient number of independent users, based on our algorithms, have indicated similar data/name for the relevant number.

When a user reports a phone number as being “spam”, we store that phone number in combination with the user’s internal ID in order to maintain the user’s spam list online and also for the purpose of building a community-based spam-blocking directory.

Received Information may be linked and combined with data from other sources.

In the following circumstances, we may disclose your personal information according to your wish or regulations by law:

- (1) Your prior permission;
- (2) By the applicable law within or outside your country of residence, legal process, litigation requests;
- (3) By requests from public and governmental authorities;
- (4) To protect our legal rights and interests.

We may also share non-personally identifiable information with third parties, such as aggregate user statistics, analytics, demographic information, and web site usage information. We will not share PI with third parties for marketing purposes without your permission. With your consent, these third parties may offer promotions (including email promotions) or sell items or services to you through our services.

Children's Online Privacy Protection Act

The Service is not designed or intended for children under the age of thirteen (13).

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not market to children under 13 We reserve the right to request proof of age at any stage to verify that minors under the age of thirteen (13) are not using the Service. If you are under the age of thirteen (13), you may not download the Software or use the Service including the Software, you may not use any feature of the Service that requires registration, and you may not provide us with any Received Information. Smart Media will not knowingly collect any Received Information concerning children under the age of thirteen (13).

Cloud Service

We plan to support Google drive cloud service and Dropbox. This service is being accessed if, and when users link their accounts with our app.

Special permissions

For the app to operate as expected we might request a permission to access call log data, data gathered from this log, will only be used within the app, for it's functionality.

Third Party Services

Our App may present our commercial partner's hyperlinks as well as those of other third parties. It is important that you consider that we are not responsible for data practices that are conducted by third-parties or the privacy thereof, and that the way in which such third-parties may assemble, process, handle or utilize your PI is not in our control. When such a link is used to go from our Site to an outside website, our Policy and Terms are redundant and your further browsing is at your personal and ultimate risk.

Law and Jurisdiction

This Privacy Policy shall be construed and governed in accordance with the laws of the State of Israel, regardless of its conflict of laws rules. The courts of Beer-sheva, Israel, shall have sole and exclusive jurisdiction over any dispute under this Privacy Policy or otherwise related to the Service.

Information Safeguard Measures

We use industry standard protocols and technology to protect the confidentiality of your registered user information and PI, such as Secure Socket Layer (SSL) technology and secure databases. Your PI is only accessible by a limited number of employees who have special access rights. Notwithstanding the foregoing, please take into account that no security measures are completely guaranteed to avoid unauthorized access, and that the Internet and related transmissions are not secure or error free communication means.

Overall, we implement and maintain reasonable security measures to protect our databases and records from unauthorized access, acquisition, destruction, use, modification or disclosure.

Changes

Periodically, and at the final discretion of ourselves, we may update, change, suspend and/modify or our App, our services, this Policy and/or our Terms, in whole or in part. We hereby reserve such right in order to operate our business and protect ourselves. Your use after any changes indicate your acceptance thereof and we will post a notice regarding such changes on our App, and may also write an email to you or otherwise notify you.

Contact

If you have any questions or queries about us, our Agreement and/or this Policy, please contact us as indicated in our contact page: app-support@smedia.co.il

Removal of your data

You may send a request to remove your PI by sending an email to dialer@smedia.co.il

Date of last effective update is 21th February 2018.