

Privacy Policy

Last update: 23/07/2021 Version: 2.0

This privacy statement governs the processing of personal data acquired by the website <https://wannachat.org/> as well as the linked mobile applications and services (collectively, the "Website"). Please carefully read this document to ensure that you understand how we handle your personal data. Please contact us if you have any further questions about our data protection practices.

1. What personal data ("PD") and non-personal data ("NPD") we collect from you, for what
2. purposes we use it, how we protect it, and how we share it with third parties;
3. How you can access and change your PD and how you can limit our sharing of it; and
4. Your legal rights that you have with respect to your PD.

<u>1. General Information and Definitions</u>	<u>1</u>
<u>2. Types and Purposes of PD and NPD that We Process</u>	<u>2</u>
<u>3. Sharing Your PD and NPD with Third Parties</u>	<u>4</u>
<u>4. Transfer of PD Outside Your Country</u>	<u>6</u>
<u>5. Retaining and Destroying Your PD and NPD</u>	<u>7</u>
<u>6. Your Rights Regarding Your PD</u>	<u>7</u>
<u>7. Protecting the Privacy Rights of Third Parties</u>	<u>9</u>
<u>8. Do Not Track Settings</u>	<u>9</u>
<u>9. Links to Third-Party Websites</u>	<u>9</u>
<u>10. Protecting Children's Privacy</u>	<u>9</u>
<u>11. Our Email Policy</u>	<u>9</u>
<u>12. Our Security Policy</u>	<u>10</u>
<u>13. Term and Changes to Our Privacy Policy</u>	<u>10</u>
<u>14. Contact Us</u>	<u>11</u>

1. General Information and Definitions

1.1 About the Website. The Website provides free-of-charge chat rooms.

1.2 Our role as a data controller. The entity that is responsible for the processing of your PD through the Website is Algo Media LTD having an address at Hasaham 30, Petah tiqwa, 49517 Israel ("**we**", "**us**", and "**our**"). We act as a data controller with regard to your

PD collected through the Website (e.g., when you register your user account, browse the Website, or communicate with us). In such instances, we are a data controller because we

make decisions about the types of PD that should be collected from you and the purposes for which such PD should be used.

1.3 Applicable laws. We process PD in accordance with applicable data protection laws, including, but not limited to, the Israeli Protection of Privacy Law, the EU General Data Protection Regulation (“**GDPR**”), and the California Consumer Privacy Act (“**CCPA**”).

1.4 Definitions. You will come across recurring terminology in this privacy statement. We'll explain what they signify for your convenience:

1.5 • "NPD" refers to non-personal data that cannot be used to identify you in any way.

1.6 • "Personal data" refers to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, identification number, location data, an online identifier, or one or more factors specific to that natural person's physical, physiological, genetic, mental, economic, cultural, or social identity. In many ways, PD is synonymous with Personally Identifiable Information (PII). PD, on the other hand, has a greater scope and includes more data.

- “**Visitor**” is someone who merely browses our Website. A “**member**” is someone who has registered with us to use our services. The terms “**user**”, “**you**”, and “**your**” are collective identifiers that refer to either a visitor or a member.
- “**Consent**” means a freely given, specific, informed and unambiguous agreement to the processing of PD.
- “**Data controller**” means the entity that determines the purposes and means of the processing of PD.
- “**Data processor**” is a natural or legal person, public authority, agency, or other body that processes personal data on the controller's behalf.
- “**Processing**” means the use of PD in any manner, including, but not limited to, collection, storage, erasure, transfer, and disclosure of personal data.

1.7 Cookies. We use cookies on the Website. For more information on the types and purposes of our cookies, please refer to our cookie policy available at <https://wannachat.org/>

2. Types and Purposes of PD and NPD that We Process

2.1 PD that we collect. We adhere to data minimisation standards and collect only the information required to ensure your proper use of the Website. We gather and process the following sorts of PD. We only use your personal information for the specific and legitimate purposes stated in this privacy statement. In short, we will only use your PD to enable you to utilize the full functionality of the Website, to provide you with the requested services, to maintain and improve the Website, to perform research about our business activities, for administrative purposes, and to respond to your inquiries. The following is a full summary of the purposes and legal basis for processing your PD.

Situation/PD	Purpose	Legal basis
--------------	---------	-------------

<p>We collect the following information when you use the Website without registering:</p> <ul style="list-style-type: none"> • Gender • Country • State • Username 	<ul style="list-style-type: none"> • To provide access to the Website • To provide you with the requested services • To contact you, if necessary To ensure security of the Website 	<ul style="list-style-type: none"> • Performing a contract with you • Pursuing our legitimate business interests (i.e., to ensure security)
<p>When you create a user account, we collect the following information:</p> <ul style="list-style-type: none"> • Username • Age • Country • City • E-mail address • Password 	<ul style="list-style-type: none"> • To create and maintain your user account • To give access to the Website To provide you with the desired services and results • To display your profile on the Website • To contact you if necessary To ensure the Website's security 	<ul style="list-style-type: none"> • Performing a contract with you • Pursuing our legitimate business interests (i.e., to ensure security)
<p>When you update your profile, we collect your:</p> <ul style="list-style-type: none"> • Image 	<ul style="list-style-type: none"> • To customise your user profile • To feature your profile on the Website 	<ul style="list-style-type: none"> • Your consent (optional personal data) • Performing a contract with you
<p>When you leave a message in a chat room, we collect: • Any PD that you opt to provide in the comment at your sole discretion.</p>	<ul style="list-style-type: none"> • To feature your message on the Website 	<ul style="list-style-type: none"> • Your consent (optional personal data)
<p>When you contact us through email or the contact form, we collect the following information:</p> <ul style="list-style-type: none"> • Your name • Your email address • The information you include in your message 	<ul style="list-style-type: none"> ▪ To respond to your enquiries ▪ To provide you with the requested information 	<ul style="list-style-type: none"> • Pursuing our legitimate business interests (i.e., to grow and promote our business) • Your consent (for optional personal data)
<p>When you use the Website:</p> <ul style="list-style-type: none"> • IP address • Cookie-related data (please refer to our cookie policy for more information) 	<ul style="list-style-type: none"> • To analyse, improve, and evaluate our business activities • To personalise the Website for your location • To ensure security of the Website 	<ul style="list-style-type: none"> • Pursuing our legitimate business interests (i.e., analyzing and improving our commercial activities and ensuring security) (for certain cookie-related data)

2.2 NPD that we collect. We automatically acquire information from your web browser or mobile device when you use the Website. This information includes the name of the website from which you joined our Website, as well as the name of the website from which you will exit our Website. This information also includes the name of your Internet service provider, web browser type, mobile device type, computer operating system, and data about your browsing activity while using our Website. We utilize all of this NPD to I analyze trends among our users to help improve our Website, (ii) discover and rectify issues, and (iii) improve our Website.

(iii) develop additional features and services.

2.3 PD obtained from third parties PD obtained from third parties. When using the Website, you have the option of allowing or restricting services, features, and integrations supplied by third parties, such as social media service providers ("Third-Party Services"). Once enabled, the providers of Third-Party Services may share certain information and PD with us, according to the Third-Party Services' privacy policies. We will only use this PD for the purposes for which it was provided. You should carefully review the privacy settings and notices of Third-Party Services to see what information may be disclosed to us.

2.4 What Happens If You Don't Give Us Your PD? We may be unable to provide you with all of our products and services if you do not provide us with the PD when requested. You can, however, access and utilize some elements of our Website without providing us with your PD..

2.5 Sensitive data. We do not intentionally collect special categories of personal data ('sensitive data'), such as opinions about your religious and political beliefs, racial origins, membership of a professional or trade association, or information about sexual orientation.

2.6 Your feedback. If you contact us, we may keep records of any questions, complaints or compliments made by you and the response, if any. Where possible, we will de-identify your PD. Please note that de-identified PD is also considered to be NPD.

2.7 Aggregated data. We will treat aggregated data as PD if your NPD is paired with specific parts of your PD in a way that allows us to identify you. If your PD is de-identified to the point where it can no longer be associated with an identified or identifiable natural person, it is no longer deemed PD and may be used for any legitimate commercial purpose.

2.8 Privacy of communication. The Website allows you to communicate with other Website users. We make reasonable measures to guarantee that any communication data transmitted through the Website stays private and secure. Furthermore, we do not access, manage, edit, delete, distribute, or reveal your messages unless it is strictly necessary for the operation of the Website, the enforcement of our legal conditions, or we are requested to do so by law enforcement agencies. You are solely liable for any communication made via the Website, as well as the content of your messages.

3. Sharing Your PD and NPD with Third Parties

3.1 Selling your PD and NPD. WE DO NOT SELL YOUR PERSONAL INFORMATION TO THIRD PARTIES FOR MARKETING OR OTHER PURPOSES. The term "sell" refers to us selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise transmitting your PD to another business or a third party for monetary or other valuable consideration. We may use your NPD for data aggregation purposes, which we may sell to third parties at our discretion. Any such data aggregation would not include any of your personal information.

3.2 Sharing PD with our data processors. We shall share your PD indicated in section 2.1 with our third-party service providers we contract to offer services to us ("Our Processors") if necessary for the purposes listed below. Web analytics companies, advertising networks, help desk providers, accountants, law firms, and others are among our Processors.

auditors, as well as email service providers. The disclosure of your personal information to Our Processors is restricted to the following situations:

- Ensuring the proper operation of our website;
- **delivering** the services requested by you
- Providing you with the requested information;
- ; providing you with the requested information;
- pursuing our legitimate business interests;
- enforcing our rights, preventing fraud, and security purposes;
- carrying out our contractual obligations;
- law enforcement purposes;
- or if you provide your prior consent to such a disclosure.

3.3 List of Our Processors. We will share your personal data only with Our Processors that agree to ensure an adequate level of protection of personal data that is consistent with this privacy policy and the applicable data protection laws. Our Processors that may have access to your PD are listed below.

Service	Name	Location	More information
Provider of web hosting services	Online.net & Amazon (AWS)	Paris, France - Online.net AWS – Virginia US	https://www.online.net/en https://aws.amazon.com/
Provider of business analytics services	Google Analytics	United States	https://analytics.google.com
Header bidding partner	Adapex	United States	https://adapex.io/
Email service provider	Sendgrid	United States	https://sendgrid.com
Providers of technical help	IT Syndicate	HongKong	https://itsyndicate.org/
	Freshdesk	United States	https://freshdesk.com
Partners in software development and business advisors	Independent contractors		

3.4 Legally required releases of PD. We may be legally obligated to disclose your PD if such disclosure is: (i) required by subpoena, law, or other legal process; (ii) required to assist law enforcement officials or government enforcement agencies; (iii) required to investigate violations of or otherwise enforce our legal terms; (iv) required to protect us from legal action or claims from third parties, including you and/or other users or members; or (v) required to protect the legal rights, personal/reasonable.

3.5 Disclosures to successors. If our company is sold or merges in whole or in part with another company that will be responsible for providing you with the Website, we have the right to transfer your PD to the new company. The new business would retain the right to use your PD in accordance with the rules of this privacy policy and any amendments to this privacy policy implemented by the new business. We also reserve the right to transfer your PD if our company declares bankruptcy and any or all of our assets are transferred to another person or firm.

3.6 Disclosure of NPD. We reserve the right to release your NPD and de-identified PD for any reason. We may, for example, share it with prospects or partners for business or research reasons, to improve the Website, to answer to authorized demands from public authorities, or to develop new products and services.

3.7 Google reCAPCHA. We have used reCAPCHA, a service provided by Google (Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA), to ensure that you are not a robot. It contributes to the Website's defense against spam and abuse. Google will collect some PD and NPD from you when you use reCAPCHA, such as I cookie-related data, (ii) your IP address, and (iii) information about your mouse actions.

(iv) CSS information for the Website, (v) date, (vi) browser language, (vii) browser plug-ins, and (viii) javascript objects. Such information will be submitted to Google. We have a legitimate interest in preventing abusive automated crawling and spam on the Website. Please see the following links for additional information about Google reCAPTCHA and Google's privacy policies: <https://www.google.com/intl/de/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

4. Transfer of PD Outside Your Country

4.1 We may keep, process, and transfer the PD we collect from you to any of the countries in which we or Our Processors operate. If you live in the European Economic Area (EEA), for example, we may need to transfer your personal data to jurisdictions outside the EEA.

4.2 We shall take reasonable precautions to protect your PD wherever it is transferred, processed, or stored. For example, we will ensure that the jurisdiction in which the recipient third party is located provides an adequate level of protection for your PD (e.g., the country in which the recipient is located is white-listed by the European Commission, or the recipient is a Privacy-Shield certified entity), or we will enter into an agreement with the respective third party that provides such protection (e.g., a data processing agreement based on the Standard Contractual Clauses provided by the European Commission).

4.3 According to Article 45 of the GDPR, the European Commission has determined that the United States and some other countries where we and our Processors are situated do not provide an appropriate degree of data protection. We rely on derogations for specific instances as provided in GDPR Article 49. We will use your PD to provide the goods, services, and/or information you request from us in order to perform a contract with you or to meet our company's legitimate interests in a way that does not infringe on your freedoms and rights.

5. Retaining and Destroying Your PD and NPD

5.1 Retention of PD. We only keep information we gather from you (including your personal information) for as long as we need it for legal, business, or tax purposes. We always make certain that there is a legal basis for storing your PD. Your information may be kept in electronic, paper, or a combination of both formats. We will securely destroy, delete, or erase your PD when it is no longer required and there is no legal reason to keep it.

5.2 **Retention of NPD.** We may keep your NPD for as long as necessary for the purposes outlined in this privacy statement. This could include retaining NPA for as long as is required to pursue our legitimate business interests, undertake audits, comply with (and demonstrate compliance with) legal requirements, resolve disputes, and enforce our agreements.

5.3 **Retention as required by law.** Please keep in mind that in some situations, we may be required by law to hold PD for a particular length of time (e.g., we have to keep our accountancy records for the time period prescribed by law). In such circumstances, we will keep PD for the time period needed by law and then delete it as soon as the mandatory retention period expires.

6. Your Rights Regarding Your PD

6.1 **Updating Your PD.** You can update your PD using services found on our Website. If no such services exist, you can contact us using the contact information found at the bottom of this privacy policy and we will help you.

6.2 **Revoking Your Consent for Using Your PD.** If you have given us permission to use your personal data, you have the right to revoke that permission at any time. Your opt-out will not affect disclosures otherwise permitted by law, such as (i) disclosures to affiliates and business partners; (ii) disclosures to third-party service providers who provide certain services for our business, such as credit card processing, computer system services, and data management services; and (iii) disclosures to third parties as necessary to fulfill your requests. (iv) disclosures to governmental agencies or law enforcement departments, or as otherwise required to be made under applicable law; (v) previously completed disclosures to third parties; or (vi) disclosures to third parties in connection with subsequent contests or promotions in which you may choose to participate, or third-party offers in which you may choose to accept. If you want to withdraw your consent for us to use your PD, please contact us using the details at the bottom of this privacy statement, and we will assist you. You can easily unsubscribe from our marketing communications by clicking the "unsubscribe" link included in every marketing email we send.

6.3 Your legal rights. You may have specific rights under the GDPR, the CCPA, and other applicable laws while using our Website and submitting PD to us. You may have any or all of the following rights, depending on the legal basis for processing your PD:

6.4 • The right to information. • The right to be informed about the personal data we gather from you and how we process it. You have the right to receive confirmation that your PD is being processed as well as access to your PD.

- **The right to rectification.** You have the right to have your PD corrected if it is inaccurate or incomplete.
- **The right to erasure** (right to be forgotten). If there is no compelling reason for us to continue processing your PD, you have the right to request its removal or deletion.
- **The right to data portability.** You have the right to seek and obtain your PD that you submitted to us for your personal use. We will send you your PD in machine-readable format (e.g., a.pdf file) within 30 days of receiving your request.
- **The right to restrict processing.** You have a right to 'block 'or restrict the processing of your PD. When your PD is restricted, we are permitted to store your PD, but not to process it further.
- **The right to object.** You have the right to object to us processing your PD for the following reasons:
 - (i) If the processing was based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - (ii) Direct marketing (including profiling); and
 - (iii) Processing for purposes of scientific/historical research and statistics.
- **Automated individual decision-making and profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Filing a complaint with authorities.** If your information has not been processed in accordance with existing legislation, you have the right to submit a complaint with supervisory authorities. If the supervisory authorities do not appropriately resolve your complaint, you may be able to seek legal redress..

6.5 How to exercise your rights? If you would like to exercise your rights, please contact us by using the contact details at the end of this privacy policy and explain in detail your request. You can contact us electronically (by email or via our contact form) or by post, whichever method you prefer. In order verify the legitimacy of your request, we may ask you to provide us with an identifying piece of information, so that we would be able to locate you in our system (we will use such information for verification purposes only). We will respond to your request as soon as possible, but no later than 30 days. We will deliver your PD in a portable and easily accessible format. You may exercise your rights for free up to two times each year. We shall instruct all of our service providers, including Our Processors, to carry out your request. Please keep in mind that in some situations (for example, if we require your PD to complete a transaction, carry out our contractual duties, comply with relevant laws, or pursue our legitimate business interests), we may be unable to erase your PD from our systems..

6.6 How to launch a complaint? If you want to file a complaint about how we manage your personal data, we ask that you first contact us and communicate your concerns. We will investigate your complaint and respond to you as soon as possible once you contact us (no later than 30 days). You have the right to file a complaint with your local data protection authority if you are dissatisfied with the outcome of your complaint.

7. Protecting the Privacy Rights of Third Parties

If any postings you make on our Website contain information about third parties, including PD, you must ensure that you have the consent to include that information in your posting. While we are not legally responsible for our users' behavior, we reserve the right to remove any postings about which we are told if they violate the privacy rights of others.

8. Do Not Track Settings

Some web browsers allow you to request that our Website not trace your movement inside our Website. When communicated to and identified by our Website, such settings are ignored. You can disable tracking features and other security options in your browser by consulting the user manual.

9. Links to Third-Party Websites

Links to other websites may be found on our website. These third-party websites are not under our control and do not fall under the purview of our privacy policies. Third-party websites will almost certainly have their own privacy policies in place. We accept no responsibility for these third-party websites and just provide links to them for your convenience. You agree that your use of and access to these websites is entirely at your own risk. It is your obligation to review the privacy policies of any third-party websites to see how they handle your personal information.

10. Protecting Children's Privacy

Anyone under the age of 18 is not permitted to use our website. As a result, we never intentionally collect PD from children under the age of 18. Please contact us if you are a parent or guardian and believe your child under the age of 18 is using our Website or submitting any PD through it. To prevent malicious removal of account information, we may request proof of identify before removing any PD from our systems. If we learn that a minor under the age of 18 is using our Website, we will deactivate his/her PD as soon as possible.

11. Our Email Policy

11.1 Marketing messages. Normally, we do not send you marketing messages. However, If we decide to do so and you sign up for our newsletter or offer your consent, we will send you marketing messages such as newsletters, brochures, promotions, and adverts telling you about new services or features of the Website from time to time. Without your permission, we will not sell, rent, or trade your email address to any unaffiliated third party.

11.2 Withdrawal. If you receive marketing-related communications, you can easily opt out of receiving them by clicking on the "unsubscribe" link provided in each email.

11.3 Notifications of information. We may send you informational notices such as service-related, technical, or administrative emails, information about the Website, and so on from time to time.

your privacy and security, among other things. Please keep in mind that we will only send such reminders "if necessary," and they do not fall within the category of direct marketing communication that requires your prior authorization.

12. Our Security Policy

12.1 To safeguard the confidentiality of your PD, we created our Website with industry-standard security features and authentication technologies. We and Our Processors additionally keep technical and physical precautions in place to protect your PD.

12.2 We put in place organizational and technical information security measures to protect your personal information against loss, abuse, unauthorized access, and disclosure. We utilize secure networks (SSL encryption), strong passwords, DDOS mitigation, limited access to your PD by our staff, and anonymization of PD as security precautions (when possible).

12.3 When you provide us with credit card information over our Website, we will encrypt it before it travels over the Internet using industry-standard technologies for performing secure online transactions. Because of the nature of the Internet, we cannot guarantee against the loss or misuse of your PD or secure data transmission. We employ third-party billing providers over which we have no control. We make commercially reasonable steps to keep your credit card number totally confidential by exclusively employing third-party billing systems that use industry-standard encryption technology to safeguard your credit card number from unauthorized use.

Security breaches. Despite our best efforts to protect your personal information, given the nature of communications and information processing technology and the Internet, we cannot be held liable for any unlawful destruction, loss, use, copying, modification, leakage, or falsification of your personal information caused by circumstances beyond our reasonable control. If a PD violation occurs, we will immediately take reasonable steps to alleviate the violation, as required by applicable law. Our liability for any breach of security shall be limited to the greatest degree permissible by applicable law.

13. Term and Changes to Our Privacy Policy

13.1 **Term.** This privacy policy enters into force on the effective date indicated at the top of the privacy policy and remains valid until terminated or updated by us.

13.2 **Changes.** We retain the right to modify this privacy statement at any time. If we decide to amend our data protection practices, we will disclose any changes on our Website so that our users and customers are always aware of them. We may request your consent for significant material changes or as required by relevant legislation. You should stop using the Website if you disagree with the modifications to the privacy policy.

13.3 **Repurposing of PD.** If we decide to disclose or use your PD in a manner other than that described at the time it was acquired, we will notify you through email (if we have it) and, if necessary, ask your approval.

13.4 **When you use our website,** we share information that we collect from you, such as your

email (in hashed form), IP address or information about your browser or operating system, with our partner/service provider, LiveRamp Inc. **LiveRamp returns an online identification code** that we may store in our first-party cookie for our use in online and cross-channel advertising and it may be shared with advertising companies to enable interest-based and targeted advertising. To opt-out of this use, please click here (https://liveramp.com/opt_out/).

14. Contact Us

If you have any questions about our privacy policy or would like to exercise your rights, please contact us using the following contact details:

Company: Algo Media LTD

Address: Hasaham 30, Petah tiqwa, 49517 Israel

Contact Email: info (at) chatib [dot] com

© Copyright notice - This document is protected under the Israeli and foreign copyrights.
The copying, redistribution, use or publication by you without our consent is strictly prohibited.