Privacy Policy

October 2019

FACEMETRICS LIMITED, a company incorporated in Cyprus with registered number HE 383574, located at Ioanni Stylianou, 6, 2nd floor, office 202, 2003 Nicosia, Cyprus (hereinafter – FACEMETRICS), together with companies in the same corporate group, take Your privacy very seriously. Please, read carefully this Privacy Policy as it sets out our data processing practices and explains how Your data are used.

This Privacy Policy is an integral part of  Terms and Conditions  and describes how we collect, use, process and disclose Your information, including personal information, when You use our App **I’m OK, Mom** (a service that allows You to share Your location and communicate with other users in Your family circle, the “App”) and our website <https://facemetrics.io/>.

When this Privacy Policy mentions "we", "us", or "our" it refers to the company FACEMETRICS LIMITED (mentioned above) that is responsible for Your information under this Privacy Policy (the **"Data Controller"**).

At any time, You may contact us via [info@facemetrics.io](mailto:info@facemetrics.io) to ask any question and execute any of Your rights mentioned below.

**“Advertising ID”** means Apple Identifier for Advertisers (“IDFA”) on Apple and Google Advertising Identity (“GAID”). These are unique identifiers for mobile device that advertisers use for personalized advertising. They are consistent across all mobile applications and thus allow cross-app tracking. Advertising IDs are non-permanent, non-personal identifiers, which are uniquely associated with Your device.

**“Device identifier”** means device type, device model, device maker, device operating system and its language or other technical data like screen size or processor, or combination of this data available from a device for a developer for checking the device compatibility with a particular application.

**“Your (personal) data”** in this Privacy Policy shall mean any data regarding You or users of the App, which identifies or allows to identify You.

1. Acceptance of this Privacy Policy

1.1 By using the App You express Your acceptance of this Privacy Policy, as such Policy may be amended from time to time.

1.2 We may provide additional information about our privacy practices at other points, for example, when we ask You to provide personal information in connection with a particular service, and where this will help us provide more relevant and timely information.

1.3 If You do not agree to be bound by this Privacy Policy then, please, do not use the App. The current version of this Privacy Policy shall be always available at [[ссылка на privacy policy]](https://readtoplay.io/policy)

2. Information collected

2.1 Information We Collect

|  |  |  |
| --- | --- | --- |
| Category of Personal Information | Purposes of Processing | Legal Basis for Processing |
| 2.1.1 Precise location of a child | * To provide our services, namely, share the location with a parent | * Performance of a contract with You (our services provision) |
| 2.1.2 Specific places You specified on the map | * To enable You to recognize some locations more quickly and save them as Your places | * Performance of a contract with You (our services provision) |
| 2.1.3 Your e-mail | * Account creation and authentication * Service-related communication | * Performance of a contract with You (our services provision) * Our legitimate interest (administering the services: verify Your account, respond to Your queries, etc.) |
| 2.1.4 Parent’s phone number (optional) | * To enable You to receive SMS notices | * Performance of a contract with You (our services provision) |
| 2.1.5 Child’s username and photo (optional) | * To personalize a child’s profile and make a child recognizable by other users in a family’s circle | * Performance of a contract with You (our services provision) |
| 2.1.6 Child’s cell phone number | * To enable a child to send SOS-SMS notices | * Performance of a contract with You (our services provision) |

**Geolocation.** We collect Your location information through Your device IP address, WiFi, Bluetooth, and GPS coordinates (e.g., latitude/longitude) available through Your mobile device. We may also gather information about Your location using other technologies and sensors which may provide us with information about nearby devices, WiFi access points and networks, and nearby cell towers.

Please, notethat to enable App’s functionalities we shall need Your Location Services and GPS to be turned on (we shall ask for Your separate permission). We do not retain information about Your location and motion history on our servers. Geolocation data is processed by Third-Party Providers as described below. In some cases we shall get only statistics data about usage of the devices.

How to turn Location Services on or off for specific apps

1. Go to Settings > Privacy > Location Services.
2. Make sure that Location Services is on.
3. Scroll down to find the app.
4. Tap the app and select an option:
   * Never: Prevents access to Location Services information.
   * Ask Next Time: This allows You to choose Always While Using App, Allow Once, or Don't Allow.
   * While Using the App: Allows access to Location Services only when the app or one of its features is visible on screen. If an app is set to While Using the App, You might see Your [status bar turn blue](https://support.apple.com/kb/HT207354#statusbar) with a message that an app is actively using Your location.
   * Always: Allows access to Your location even when the app is in the background.

2.2Information You Provide to us

2.2.1 We do not collect any information which identify or allows to identify You, unless You voluntarily provide us with such data (in particular, when communicating with our support team, leaving feedback re Your experience with the App) or when certain parts of our services ask You to provide personal information voluntarily (e.g. we process Your email when You submit enquiries via Facemetrics website along with other information You deem necessary to provide or request; or our Service request name at the start of use in order to welcome the user in the future or to inform him about his progress).

2.2.2 If You leave Your email we may send You our updates (marketing communications), unless You opt-out receiving these messages from us by clicking “UNSUBSCRIBE” inside the message.

2.2.3 In case if You insert name for welcoming and progress information we do not receive this information from Your device and not associate this data with other information about You.

2.3 Information Collected by Third-Party Providers

2.3.1 For the purposes of Services provision, namely, a child’s location data tracking and sharing it to a parent, we engage the following third-party providers (hereinafter – Providers) to collect personal information mentioned in Clauses 2.1.1 and 2.1.2:

|  |  |
| --- | --- |
| Provider/Service | Provider’s Data Policy |
| Apple Location Services | <https://support.apple.com/en-us/HT207056> |
| Google Maps Platform | <https://policies.google.com/privacy> |

2.3.2 For the purposes of attribution and tracking the performance of the App, including their effectiveness, usage, installations and downloads, we may engage advertising and analytics Providers, currently the following Providers are being engaged:

|  |  |
| --- | --- |
| Provider/ App | Provider’s Data Policy |
| AppsFlyer | <https://www.appsflyer.com/privacy-policy/> |
| Fabric | <https://policies.google.com/privacy> |
| Firebase Analytics | <https://firebase.google.com/terms/analytics/> |
| Fiber Crashlytics | <https://firebase.google.com/terms/crashlytics/> |

To see the list of open source licenses used please follow the link: [http://facemetrics.io/open-source-licenses](https://facemetrics.io/open-source-licenses) The lists of Providers and open source licenses used may be amended from time to time, please refer to this Privacy Policy to obtain up-to-date information.

2.3.3 The Providers may collect the following personal information about users of the Devices: age, IP address, device ID, advertising IDs and location data. Such information shall be collected directly by Providers and will not be shared with us. The Providers may combine such information with other personal information they have in their procession and may be used by them for targeted advertising, i.e. for showing the most relevant ads to You across Internet network.

Please, note that there will be no any targeted advertising on the devices specified as a child’s device.

2.3.4 Personal data mentioned in Clause 2.3.3 shall be collected based on our legitimate interest according to  Clause 3.1.2. of this Privacy Policy. We will comply a case-by-case test to ensure eligibility of our legitimate interests, including necessity assessment and balancing test.

2.3.5 If You do not wish Your data to be processed for receiving a personalized advertising and analytical purposes You may opt out as described in  Clause 4.5  or if applicable simply turning off the switcher in the Settings menu in the App or You may send Your request via info@facemetrics.io. We will erase Your personal data and request our providers to do the same within 30 days upon Your request.

2.3.6 Besides statistics data collected by the Providers, the data on how You are using the App will be accessible. These data will not be personalized or linked to device You are using. These data are needed to enable proper operation of the App, in particular to identify and fix the problems You are facing when using the App.

2.3.7 To enable operation of the App a specific identifier to the statistics and usage data may be generated by some Providers and though collected by us. This identifier is specific for each App (i.e. it is not the same across multiple applications, like advertising ID). This identifier permits us solely to identify that events of using the App belong to the same user, however does not let it possible to identify that user.

2.3.8 Other data about Your Devices that do not permit direct association with You or other individuals, such as the operating system, settings, language, wireless network, mobile network information, software and hardware attributes may be also collected by our Providers.

2.3.9 We do not collect personally identifiable information about Your online activities over time and across third-party websites or online services, but such information is collected by our Providers. Our Providers generally do not respond to Do Not Track (DNT) signals or other mechanisms that provide You with the ability to exercise choice regarding the collection of such information. Nevertheless, if You want us not to use, or to stop using, such Providers in relation to You, please do not give or withdraw Your consent mentioned in Clause 2.3.5.

2.4 Cookies

2.4.1 We also use various third party cookies to help us improve our website. Cookies are files with small amount of data, which are placed on Your computer by websites that You visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are stored on Your computer’s hard drive.

2.4.2 You can instruct Your browser to refuse all cookies or to indicate when a cookie is being sent. However, if You do not accept cookies, You may not be able to use some options of our Service (more details are set out in our Terms).

3. Basis for processing

3.1 The legal bases that we rely upon when processing Your personal data are as follows:

3.1.1 Processing of Your data, mentioned in  Clause 2.1, is required for the provision of Services to You.

3.1.2 Processing of Your personal data as described in Clauses 2.2 (serving Your request and sending marketing communications), [2.3](https://readtoplay.io/policy/#section-222) (data processing for analytics and ads personalization) and 2.4 (cookies) is our legitimate interest to improve the performance of our business and provide You with information and services You request, as well as the best possible website we can, incl. ensuring our website is kept secure.

We pay special attention to Your data protection rights making sure that Your data protection rights are not overridden by our legitimate interests.

These legitimate interests are: (a) to ensure effective administration and management of Your relationship with us; (b) to understand how You use our Services and how we can improve the customers usage experience; (c) understand and respond to Your feedback; (d) to prevent, detect, or investigate unauthorised use of our Services; (e) ensure we comply with law and our policies; and (f) manage any disputes and accidents and take legal or other professional advice.

3.1.3 Contractual necessity covers information that is processed by us in order to provide You with service that You have requested – and that we have agreed – to provide to You.

3.1.4 Legal obligation covers information that is processed by us to comply with a legal obligation.

3.1.5 We will ask for Your separate permissions for sending push notifications to You. If You change Your mind re permissions granted, You will be able to revoke them at any time afterwards by changing settings on Your device.

4. Purposes of processing

4.1 The data collected under this Privacy Policy shall be used for the purposes of:

* delivering the Services to You (including, maintaining and monitoring the proper operation of the App, fixing any problems in its operation);
* ensuring and protecting the safety and security of the App, protecting our Intellectual Property Rights and other rights;
* conducting statistical and analytical surveys and researches, in particular for improving the Services and Your user experience.
* displaying advertisement, i.e. showing the most relevant ads to You across Internet network (for parents’ devices only);
* attribution and tracking the performance of our advertising campaigns and applications, including their effectiveness, usage, installations and downloads.

4.2 Personal data mentioned in Clause 2.3.2 shall be processed by our Providers for the purposes of:

* attribution and tracking the performance of Our advertising campaigns and applications, including their effectiveness, usage, installations and downloads;
* targeted advertising, i.e. for showing the most relevant ads to users of the Devices across Internet network.

4.3 In case You voluntarily provide us with any personal data, we shall process these data solely for the purposes for which they were provided to us and for no longer they are needed to fulfil such purposes.

4.4 We limit access to data we hold about You to employees who we believe reasonably need to come into contact with that information to provide Services to You or in order to fulfil their official duties. These employees are bound by confidentiality obligations and may be subject to liability, if they fail to meet these obligations. We will take all steps reasonably necessary to ensure that Your data are treated securely and in accordance with this Privacy Policy.

4.5 Information collected under  Clause 2.3.2  via the App shall be used for automated decision making, as our Providers perform their advertising and analytics services based on automated analysis of Your browsing behaviour. As a consequence of automated decision making You will receive advertisements throughout the Internet which the system considers the most relevant to You.

4.6 In case You don’t want to be subject to automated decision making, You can always limit collection of Your data used for targeting by managing Your mobile devices:  
  
On Your iPhone, iPad, or iPod touch:

* Go to Settings > Privacy > Advertising.
* Turn on Limit Ad Tracking.

On Your Android:

* Open Your device's Settings app > Google, or open the Google Settings app (differs depending on Your device).
* Under “Services,” select Ads.
* Turn on “Opt out of Ads Personalization” by moving the switch to the right until it turns blue.

Note: If You clear Your cache, You'll lose Your opt-out setting.

Once You've turned off personalization, Google will no longer use Your info to personalize Your ads. Ads can still be targeted with info like Your general location or the content of the website You’re visiting.

5. Sharing of data

5.1 We share Your personal information, including username, cell phone number and location with persons identified as Your parents within Your family circle.

5.2 We do not share other Your personal information with any other parties. However, information collected by our Providers as described in Clause 2.3 when this is needed for the purposes of processing may become available for the following categories of recipients:

* the companies being in the same corporate group with us;
* data storage, networking and security providers;
* advertising and analytics third party providers (upon Your consent only);
* providers assisting us with client support;
* any other providers assisting us with delivering and improving the Services for You.

5.3 We may also share Your data when it is required by law and/or any regulatory authority. In such circumstances, we will expressly inform the third party of the confidential nature of the data shared.

5.4 Our third-party providers which directly collect such data via integration with the App may be located in non-EEA countries, where data protection and privacy regulations may be different from Your home country and offer even lower level of protection. You acknowledge and give Your consent to such transfer and processing of Your data out of EEA to the countries where data protection and privacy regulations may be different from Your home country and offer even lower level of protection. To safeguard Your interests when transferring Your personal data out of EEA to the countries which do not provide an adequate level of data protection, we will use standard data protection clauses adopted by the European Commission or Our supervisory authority.

5.5 All the third parties with which we may share Your data only get the minimum amount of data that are reasonably required in order for them to provide their service to us and therefore to You. The use of the shared information by such third parties is strictly limited to the purposes of processing outlined in this Privacy Policy and is not permitted for any other purpose. All third parties with which we share Your data are required to protect such data in accordance with all relevant laws and regulations and in a manner similar to the way We protect the same.

5.5 We will not share Your data with third parties which are considered as not being able to provide its clients and potential clients with the required level of protection.

6. Your rights

6.1 With respect to Your personal data we process (if any) You have the right:

* to obtain from us the information regarding our processing of Your personal data;
* to obtain from us without undue delay the rectification of inaccurate personal data concerning You;
* to obtain from us the erasure of Your personal data Your ‘right to be forgotten’);
* to restrict our processing of Your personal data, when it is permitted under applicable law;
* to obtain from us Your personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller without any obstacle on our side;
* to lodge a complaint against us with a supervisory authority for GDPR purposes – Cyprus Data Protection Commissioner’s Office.

Please contact us via [info@facemetrics.io](mailto:info@facemetrics.io) to execute any of the rights as stated above.

7. Protecting children’s privacy

7.1 The App may only be used by children with the consent of a parent or person with parental responsibility over the child. The child's device may only be joined to a family circle by the person granting consent. The age at which children need parental consent varies between countries. Please, refer to Your applicable law to define whether Your child needs Your parental consent.

7.2 In general, children under 13 always need a parental consent. Therefore, if You wish to add a child who is under 13 to a family circle, You must first complete the Parental Consent Form and return it via mail, fax or email. The parental consent form can be found here: \_\_\_\_. We will ask You to sing this form when You add Your child, in case You specify that the child is under 13. Also, we will provide You with a brief notice describing our privacy practices towards children.

7.3 In case You add Your child who is between 13 and 16 years old, we will ask You to provide Your parental consent, in case this is required by Your applicable law.

7.4 If You are a parent or legal guardian and believe that Your child under the age of 13 (or more subject to Your applicable laws) has submitted his or her personal data or other data without Your consent, permission, or authorization – please let us know immediately, and we will promptly act to remove Your child’s data from our database, cease the use of such data and inform any other party we suspect to have access to such data to do the same.

7.5 If You would like to review or delete any personal information we have collected from Your child, or to withdraw permission for us to collect any information from the child, please contact us at [info@facemetrics.io](mailto:info@facemetrics.io).

8. Period of processing

8.1 We do not retain Your location data except for places You save.

Records of other personal data are retained (in case having any) for no longer they are needed for the purposes for which You provided them to us, unless You we have a bases to further process Your data as described in the  Section 3 of this Policy.

8.2 If You request erasure of Your data or You unsubscribed from our marketing communications we erase Your data from our servers and request our providers to do the same within 30 days upon Your request.

8.3 With respect to non-personal data we are not limited by any particular retention period.

9. Privacy Policy updates

9.1 We shall update this Privacy Policy from time to time. In the event we materially change this Privacy Policy including how we collect, process or use Your personal data, You will receive the respective notification via the App.

9.2 Any changes to this Privacy Policy with respect to processing of Your personal data shall be subject to Your prior consent, unless they are required under applicable law.

9.3 Unless otherwise required by law, any changes to this Privacy Policy with respect to processing of Your non-personal data and changes with respect to processing of Your personal data shall become effective immediately upon their posting in the App.

9.4 In case You continue to use the App after You have received the notification about the changes we presume that You have read the new Privacy Policy and accept all the introduced changes.

9.5 It is Your responsibility to periodically review this Privacy Policy to be aware of the current changes (as we will notify You only about the material changes).

9.6 If You do not accept Privacy Policy following an amendment, do not start or continue to use the App.

10. Questions and complaints

10.1 If You have any requests concerning Your personal information or any queries with regard to this Privacy Policy please feel free to contact us via [info@facemetrics.io](mailto:info@facemetrics.io).

10.2 You consider that our collection, usage, disclosure and/or storage of Your personal information violate any applicable data protection laws we are bound by, please refer Your complaints to [info@facemetrics.io](mailto:info@facemetrics.io). We will consider them within reasonable time and provide You with an answer.