# **Privacy Policy**

Last updated: May 01, 2023

This Privacy Policy describes Our policies and procedures on the collection, use, and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

### Interpretation and Definitions

#### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- **Company** (referred to as either "the Company", "We", "Us," or "Our" in this Agreement) refers to Dicty, Flat 4F Shillington Old School.
- **Cookies** are small files that are placed on Your computer, mobile device, or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to: United Kingdom
- **Device** means any device that can access the Service, such as a computer, a cellphone, or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Website.
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used.

- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Website refers to Dicty, accessible from <u>https://dicty.app</u>.
- App refers to Dicty, accessible from
  - AppStore https://apps.apple.com/us/app/dicty/id6444068673
  - Google Play https://play.google.com/store/apps/details?id=app.dicty
- You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

# Collecting and Using Your Personal Data

### Types of Data Collected

#### Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address;
- First name and last name;

#### Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to: the type of mobile device You use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

#### **Tracking Technologies and Cookies**

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. 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 parts of our
Service. Unless you have adjusted Your browser setting so that it will refuse Cookies,
our Service may use Cookies.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

#### • Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

#### • Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

### Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- To provide and maintain our Service, including monitoring the usage of our Service.
- **To manage Your Account**: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- For the performance of a contract: the development, compliance, and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You**: To contact You by email or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers, and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend to and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and evaluating and improving our Service, products, services, marketing, and your experience.

We may share Your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service for payment processing to contact You.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners, or other companies that We control or that are under common control with Us.
- With business partners: We may share Your information with Our business partners to offer You certain products, services, or promotions.

- With other users: when You share personal information or otherwise interact in public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

# Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

# Deletion of Your Personal Data

You have the right to get Your Personal Data deleted. To request the removal of Your Personal Data, you can:

- Visit the corresponding section in the App by doing the following: Follow the Account link in the App menu, and click on the **Delete the Account** link.
- Visit the corresponding section on the Website by doing the following: Follow the Account link in the Website menu or open https://dicty.app/account, and click on the Delete the Account link.

After requesting the removal, Your Personal Data will be erased immediately without the right to restore it.

# Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy, followed by Your submission of such information, represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy, and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of Your data and other personal information.

# Disclosure of Your Personal Data

### **Business Transactions**

If the Company is involved in a merger, acquisition, or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

#### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

# Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

# Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process, and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

### Facebook Technologies Data

We use Facebook Login or Facebook SDK to provide sign-in or sign-up for our Service. Using Facebook Login or Facebook SDK, we may collect Your Personal Data:

 Internal Facebook User ID Collection: always To provide the Service using future authorizations.

Their Privacy Policy can be viewed at <u>https://www.facebook.com/policy.php</u>.

### Apple Technologies Data

Using Apple SDK, we may collect Your Personal Data:

- Internal Apple User ID Collection: always To provide the Service using future authorizations.
- Device Id / Push Token ID
   Collection: if You give a consent
   To allow communication using iOS Push protocol.

Their Privacy Policy can be viewed at https://www.apple.com/legal/privacy/en-ww/.

### **Google Technologies Data**

Using Firebase SDK, we may collect Your Personal Data:

- Internal Google User ID Collection: always To provide the Service using future authorizations.
- Device Id / Push Token ID Collection: if You give a consent To allow communication using Google Push protocol.

Their Privacy Policy can be viewed at https://firebase.google.com/support/privacy

### **Payments**

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g., payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors, whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

- **Stripe** Their Privacy Policy can be viewed at <u>https://stripe.com/us/privacy</u>.
- Apple InApp Purchases
   Their Privacy Policy can be viewed at https://www.apple.com/legal/privacy/en-ww/

# Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

# Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

# Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: ask@dicty.app
- Using the app: Support section in the App menu
- Using the website: Support section in the Website menu