

# **Privacy Policy**

Effective Date: 12 August 2022

At PinStudios we respect your privacy and believe that the less we know about you, the better both for you and for us. In fact, we do not collect any personal data through any of our apps unless you voluntarily provide it to us (e.g., by sending a support email or subscribing to a newsletter). We limit the information we collect to the minimum necessary to provide you with our service and improve our apps. Our business is developing and selling software, not your personal data.

Below, we've provided detailed information on when and why we collect your personal data and how we use it. Please read this Privacy Policy carefully before providing any personal data to us.

This Privacy Policy contains information about our data protection practices and measures as well as the rights to which you are entitled within the framework of Lithuania's Law on Legal Protection of Personal Data No. XIII-1426 ("DPL") and the General Data Protection Regulation ("GDPR").

# Owner and operator of the apps

The controller within the meaning of the DPL and the GDPR for the processing of personal data is:

PinStudios MB, Architektu str. 37-84, 04106 Vilnius Lithuania

Web: <u>www.pinstudios.com</u> E-Mail: <u>info@pinstudios.com</u>

Tel: +370 671 07695

If you have any questions about the processing of your personal data, as well as your rights regarding data protection, please contact us.

#### Data storage

We do not collect or store any of your data on our servers. We do use some third-party tools in a way described in this privacy policy.

# **Usage analytics**

We collect information about the way you use our apps. This information is anonymized and cannot be used to personally identify you as a natural person. We're only interested to know how many users use our apps, what features are used more often, and if there is anything we can do better. The analytics data may include:

- anonymized user id;
- device type, model, and identifier;
- operating system;
- language;
- country, region, city;
- application version;
- application subscription information (plan, status, duration, etc.);
- events performed within the application (e.g., "user completed onboarding");
- error codes and error messages.

We use Amplitude and Flurry to collect, store, and analyze this data.



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# Crash reporting

If any of our apps crashes while you're using it, we collect anonymized data about the crash to help us identify and hopefully fix the issues in a future update. This data contains information such as the state of the application, operating system, and device that you use. It does not include your personal data, and we cannot identify you as a natural person.

We use Crashlytics to collect and analyze crash reports.

#### **Payments**

When you make payments related to any of our mobile apps, you submit your payment details to Apple or Google Play that process your payments. We do not collect your payment data and do not have any access to it. Please refer to the privacy policies of Apple and Google to check how they process your payment data.

#### Cookies

We do not use any cookies on the Website or any of our apps.

# **Support interactions**

When you contact us by sending us an email, we collect your email address, name, and any other information you provided in your message voluntarily. This information is collected to help resolve your inquiry. If you would like to remove the emails you have sent, please let us know. The legal basis on which we rely is "pursuing our legitimate business interests (i.e., grow and maintain the apps and the website) and "your consent" (for optional personal data that you voluntarily provide).

We use **Gmail** to receive your messages.

## What if you refuse to provide your personal data?

If you decide not to provide us with your personal data when requested, we may not be able to perform the requested operation (e.g., to reply to you).

## Disclosure of your personal data to third parties

We do not disclose your personal data to third parties unless it is necessary for the operation of the app, or pursuing our legitimate business interests. Our data processors are the service providers that may have access to some of your personal data. You can find a list of processors that may have access to your personal data in the sections that describe the types of personal data collected by us.

When disclosing your personal data to our data processors, we make sure that the recipient can ensure an adequate level of protection to your personal data. For example, we make sure that the jurisdiction in which the recipient third party is located guarantees an adequate level of protection to personal data, or we conclude an agreement with the respective third party that ensures such protection (e.g., a data processing agreement based pre-approved standard contractual clauses).

We do not ever sell your personal data to third parties.



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#### **Accountability**

In certain countries, including in the European Union, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how we process your personal information. The data protection authority you can lodge a complaint with notably may be that of your habitual residence, where you work or where we are established.

If you would like to launch a complaint about the way in which we process your personal data, we kindly ask you to contact us first and express your concerns. If we receive your complaint, we will investigate it and provide you with our response as soon as possible. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

We do not discriminate you if you decide to exercise your rights. It means that we will not (i) deny any goods and services, (ii) charge you different prices, (iii) deny any discounts or benefits, (iv) impose penalties, or (v) provide you with a lower quality service.

#### Storage period

We store your personal data only as long as such personal data is necessary for the purposes for which it was collected or until you request us to delete your personal data. After your personal data becomes no longer necessary for its purposes and there is no other legal basis for storing it, we will immediately securely delete such personal data from our databases and service providers.

Your non-personal data may be retained for as long as necessary for the purposes described in this Privacy Policy, including for the time period needed for us to pursue our legitimate business interests. In certain cases prescribed by law, we are obliged to store your personal data for a limited period of time (e.g., for archiving our business records). In such cases, we store relevant personal data for the time period required by the applicable law and delete the personal data as soon as the required retention period expires.

## Note on data transfer to the USA

Amongst other things, tools from companies based in the USA are integrated in the App. If these tools are active, your personal data may be transferred to the US servers of the respective companies. We would like to point out that the USA is not a safe third country in the sense of Lithuania or EU data protection law. US companies are obliged to hand over personal data to security authorities without you as a data subject being able to take legal action against this. It can therefore not be ruled out that US authorities (e.g., intelligence services) process, evaluate and permanently store your data located on US servers for monitoring purposes. We have no influence on these processing activities.

#### Children's Privacy

Our services are restricted to users who are 16 years of age or older. We do not permit users under the age of 16 on our platform and we do not knowingly collect personal information from anyone under the age of 16. If you suspect that a user is under the age of 16, please contact us.

## **Updates and questions**

This Privacy Policy becomes active on the date indicated at the beginning of it. We may make changes to the Privacy Policy at any time. Up-to-date information will always be available on this page.

Please contact us by email at <a href="mailto:info@pinstudios.com">info@pinstudios.com</a> if you have any questions.