

# Privacy Policy

## 1. INTRODUCTION

This "Cat Speak - Talk to cat" branded mobile application and any services provided through this application (the "Cat Speak - Talk to cat") referred to as "Cat Speak - Talk to cat", "we", "us" or "our". Our Privacy Policy applies when you use any of the Cat Speak - Talk to cat. By using a Cat Speak - Talk to cat, you are consenting to our processing of your information in ways set out in this Privacy Policy.

The information we collect about you through your use of Cat Speak - Talk to cat is controlled by STOMBERG s.r.o. in accordance with Italian law. Our Privacy Policy may change so you should review it regularly. We will notify you of any material changes in the way we treat your information through the Cat Speak - Talk to cat you use.

## 2. DATA WE COLLECT

When you use a Cat Speak - Talk to cat, STOMBERG s.r.o. or its trusted partners may collect data from your mobile device, including information which directly or indirectly identifies you. Your information may be kept in an identifiable format, or in an aggregate format which means that you cannot reasonably be identified from it. The information we collect about you (collectively and individually, the "Information") includes:

- If an Cat Speak - Talk to cat offers you the option to register, we will collect the Information you provide to us in the registration form. This may include identification data such as your name, email address or other account or registration data.
- We will also collect your Information when you use Cat Speak - Talk to cat such as when you post or share material, upload data, request further services or make selections using the Cat Speak - Talk to cat, if such functionality is available in the Cat Speak - Talk to cat.
- We will collect Information about you when you interact with us such as when you report a problem, contact or communicate with us.
- Geolocation data, which is any Information which indicates the geographical position of your device and which may include the time the location was recorded, and may include precise (e.g., GPS-level) location data. Some Cat Speak - Talk to cat may collect this data when the App is not open or actively in use (This may help us or third parties to customize information, content, or offers to you, for instance.) The Cat Speak - Talk to cat and/or your mobile device may provide options for you to control the use and/or sharing of precise device location data.
- Any of your Information you provide or permit to be provided to us via a social network or public forum provider like Facebook when you link the Cat Speak - Talk to cat to your social network or public forum account. This data may include your use of the Cat Speak - Talk to cat on such public forums and/or social networks, including with whom you share the Cat Speak - Talk to cat. For further information as to how and for what purpose the social network provider collects etc. your data, please see their privacy policy.
- We automatically collect certain Information from your device when you use the Cat Speak - Talk to cat including Information about your device, carrier and other technical data.

## 3. HOW WE USE THE INFORMATION WE COLLECT

We may use the Information (elements of which we may use alone or in combination with each other data/Information) we collect to:

- Deliver the Cat Speak - Talk to cat to you and ensure their optimal functionality and operation;
- Provide you with customer support;
- Perform research and analysis about your use of, or interest in, our products, services, or content;

- Communicate with you by e-mail, postal mail, telephone and/or mobile devices (including through in-application advertising) about products or services that may be of interest to you either from us, our parent or subsidiary companies or other third parties. If you do not wish to receive in-application advertising, in some cases you can upgrade to the paid version of the app;
- Develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness. For instance, we, or these third parties may serve music-related ads or offers to users who have installed music-related apps (whether or not these are Cat Speak - Talk to cat). Similarly, users who frequently visit music-related venues may likewise receive ads or offers to install music-related apps;
- Verify your eligibility and deliver prizes in connection with contests and sweepstakes and in order to conduct polls and surveys;
- Enforce our terms, conditions and policies and to communicate with you;
- Manage and improve the Cat Speak - Talk to cat(s). For this purpose, we may use and combine your Information which we collect across different Cat Speak - Talk to cat used by you;
- When we collect your precise geolocation data (subject to your consent) (which may be via the device's cellular, Wi-Fi, Global Positioning System (GPS) networks and/or Bluetooth information), we do so to provide you with our location-related products and services, for example to provide you with forecast and weather alerts for your location, and also to facilitate, measure, or otherwise support advertising by third parties (through our apps or third parties' apps) that may be related to your location over time.
- When you share your Information with us via a social network provider like Facebook, we use this to show Information on your social network profile (subject to your privacy setting and preferences for such social network) and to allow you to share Information about our services with your connections or on your social network profile.

#### **4. CROSS-APP ADVERTISING AND OTHER INTEREST-BASED ADVERTISING TECHNOLOGIES**

As described in Sections 3 and 5 of this Privacy Policy, we sometimes work with third parties to deliver ads, content or offers. Sometimes we or these third parties do so through a mobile "SDK." The SDK is a bit of computer code that app developers can include in their apps to enable ads to be shown, data to be collected, and related services to be implemented. We may use this and similar technology to deliver certain advertising through mobile applications and browsers based on data associated with your mobile device, and we may work with third parties who likewise embed their SDKs into Cat Speak - Talk to cat, for third party advertising. If you'd like to opt-out from having ads tailored to you in this way on your mobile device, please follow the instructions below.

If you wish to opt out of interest-based cross-application tracking through your mobile device, you can do so through your device "settings", as follows (but please note that the below is for informational purposes only and Apple, Google, or other device platforms may change the manner in which their "opt out" settings work at any time): Please note that if you opt out through these settings, you will continue to receive advertising after you opt-out, but it may not be tailored to your interests. For instance, that advertising may be based on your real-time or "contextual" application usage or general location inferred from IP address.

##### **Opting Out on iOS Devices Such as iPhones, iPads or iPods**

If you have an Apple device, you can opt out of mobile interest-based or "cross-app" advertising by updating to iOS 6.0 or higher, and setting Limit Ad Tracking to 'ON'. On an iPhone 6 for example, you can do this by clicking on Settings -> General -> Privacy -> Advertising and toggling "Limit Ad Tracking" to 'ON'. Our systems are designed to respect your choice and not use Information to provide interest-based advertising when this setting is ON.

##### **Opting Out on Android Devices**

If you have an Android device and would like to opt out of mobile interest-based or "cross-app" advertising, you may do this as follows:

- Open the Google Settings app on your device

- Select Ads
- Opt out of interest-based ads

We may sometimes work with partners to help us or help them correlate content or ads provided to users across devices or browsers. For instance, a brand may wish to use the Information that we collect (or data that its own partners collect) to send offers to its customers across both mobile applications and browsers. We thus also provide the links below to the NAI "Consumer Opt-out," DAA opt-out, and Google opt-out that are only applicable to participating third parties, which does not include STOMBERG s.r.o.. You may also block certain App Identifiers by changing the settings of your device. However, we do not currently recognize or respond to browser-initiated Do Not Track signals, as the Internet industry has not reached a consensus as to Do Not Track standards, implementations and solutions.

<https://support.google.com/ads/answer/2662922?hl=en>

<http://www.networkadvertising.org/choices/>

<http://www.aboutads.info/choices/>

## 5. SHARING YOUR INFORMATION

We may share your Information as follows:

- We may share your Information with our authorized service providers that perform certain services on our behalf. These services may include providing customer service and marketing assistance, performing business and sales analysis, supporting our Cat Speak - Talk to cat functionality, and supporting marketing promotions (e.g., contests and sweepstakes) surveys and other features offered through our Cat Speak - Talk to cat. These service providers may have limited access to your Information, which is needed to perform their functions, but are not permitted to share or use such Information for any other purposes.
- When you engage in promotions offered through the Cat Speak - Talk to cat, we may share your Information with the businesses with which we partner to offer you those products, services, promotions, contests and/or sweepstakes; unless, we have otherwise committed to you that we will not share specific Information you provided. When you elect to engage in a particular merchant's offer or program, you authorize us to provide your email address and other Information to that merchant.
- We may also allow third-parties, including our authorized service providers, parent and subsidiary companies, affiliates, advertising companies and ad networks, to display advertisements in the Cat Speak - Talk to cat or other apps or use App Identifiers for the purpose of advertising and direct marketing. These companies may use technologies to collect data about users, including non-precise and/or precise location data, to help them tailor relevant ads and content and analyze and measure ads' effectiveness or, more generally, brand and mobile audiences. These companies may collect this data through SDKs or from users who view or interact with their advertisements.
- Other Situations. We may disclose your Information (i) to respond in good faith to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; (ii) in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; (iii) to protect and defend the rights, property or safety of our company, our users, our employees, or others; (iv) to comply with applicable law or cooperate with law enforcement; (v) to enforce our Cat Speak - Talk to cat terms and conditions or other agreements or policies; and (vi) in connection with a substantial corporate transaction, such as the sale of our business or the Cat Speak - Talk to cat, a divestiture, merger, consolidation, or asset sale or transfer, or in the unlikely event of bankruptcy. In addition, we may share aggregated Information we collect, under any of the above circumstances, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other legitimate business purposes. Please note that such aggregated Information will not include any Information which allows third parties to identify you.

## 6. COOKIES, IDENTIFIERS AND DATA ANALYSIS

We may collect certain device data and electronic identifiers such as the mobile device identifier provided by your mobile device operating system, your mobile operating system details and the name of your mobile carrier. For example, if you use the iOS platform then Advertiser IDs (also known as "IDFAs" if you have an Apple device or "Android Ad IDs" if you have an Android device) may be collected. Other identifiers collected may include IP addresses, OpenUDID, Session ID, ODIN1, iOS Vendor IDs, MAC addresses, IMEI, Android ID for Android platform, and ODIN1 for OS X (together with the IDFAs, the "App Identifiers").

When you use the Cat Speak - Talk to cat(s), we may use the App Identifiers to facilitate access to the Cat Speak - Talk to cat, help us recognize you across different Cat Speak - Talk to cat, to enable you to use the Cat Speak - Talk to cat, to personalize your experience, to increase security, measure the use and effectiveness of our Cat Speak - Talk to cat and serve advertising. You can block certain App Identifiers by changing the settings of your device.

We also collect information about how and when you use the Cat Speak - Talk to cat. This includes the amount of times you used the Cat Speak - Talk to cat, which parts of it you viewed and other technical data such as country settings and timestamps.

### Firestore

Cat Speak - Talk to cat uses the Google Analytics tool Firestore in order to carry out analysis on Information which is gathered by Cat Speak - Talk to cat. App Identifiers and other Information which Cat Speak - Talk to cat gather are provided to Google in order to enable them to carry out data analysis. Any Information (including App Identifiers) which are provided to Google will become subject to Google's privacy policy which is located here:

[www.google.com/privacy.html](http://www.google.com/privacy.html).

For further information on how Google's Firestore analytics tool uses data, please see the site "How Google uses data when you use our partners' sites or apps", (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)).

### Bugfender

Cat Speak - Talk to cat uses the Beenario GmbH tool Bugfender in order to carry out analysis on Information which is gathered by Cat Speak - Talk to cat for debug purposes. App Identifiers and other Information which Cat Speak - Talk to cat gather are provided to Bugfender in order to enable them to carry out data analysis. Any Information (including App Identifiers) which are provided to Bugfender will become subject to Bugfender's privacy policy which is located here: <https://bugfender.com>

### Website Cookies

Separately to the Cat Speak - Talk to cat, the website itself uses cookies. Certain information about you, (including personal information), may be collected through the use of cookies when you visit and interact with our website. Some of these cookies are essential for the website to operate and ensure that we provide the services you requested. By using our services you agree to the use of certain non-essential cookies unless you set your browser to reject them.

A cookie is a small text file that is stored on your computer's hard drive or browser. We use cookies and the information contained therein for a number of purposes including but not limited to:

- tracking the duration of visits and content accessed; and
- storing frequently used user information to personalise your online experience and ease the log-in process.

You may block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our Site. Further information on cookies and how websites use them can be obtained at [www.cookiecentral.com](http://www.cookiecentral.com)

## **7. HOW WE PROTECT YOUR INFORMATION**

The security and confidentiality of your Information is very important to us, so we take security measures (including physical, electronic and procedural measures) to help safeguard your information from unauthorized access and disclosure. Please know that, despite our efforts, no security measures are perfect or impenetrable.

## **8. INFORMATION RELATING TO CHILDREN**

The Cat Speak - Talk to cat are not directed to children under the age of 13. If we become aware that Information has been collected from a person under the age of 13, we will delete this Information and terminate the person's account as quickly as possible. If you believe that we may have Information from or about a child under the age of 13, please contact us and we will promptly delete that Information.

## **9. WHERE WE STORE YOUR INFORMATION**

The Information that we collect from you may be transferred to, and stored at, a destination outside of your country and the European Economic Area ("EEA") and, in particular, the US, which may have different or less protective privacy laws than those in your country. The Information may also be processed by any service providers appointed by us who operate outside the EEA and their staff, and/or our own staff based outside of the EEA. By submitting or permitting us to collect your Information, you agree to this transfer, storing or processing outside of the EEA. Information transferred will be treated in accordance with this Privacy Policy.

## **10. HOW LONG WE STORE YOUR INFORMATION**

We will keep your Information for as long as is necessary to provide you with the Cat Speak - Talk to cat and for us to comply with our obligations under this Privacy Policy and at law. We may retain data after you cease using the Cat Speak - Talk to cat, for instance, for operational, auditing, content or ad measurement purposes, or to analyze and improve the way we provide our services.

## **11. DATA DELETION**

Uninstallation and removal methods vary depending on your device. To uninstall and remove the Cat Speak - Talk to cat, please use the application manager provided with your device or consult your device manual or online instructions provided by the device provider for reference.

## **12. ACCESS TO AND CHOICES REGARDING YOUR INFORMATION**

You may have the right to access Information held about you or require it to be modified (if inaccurate) or deleted. Your right of access can be exercised by contacting us using the details set out below. Any access request may be subject to a fee to meet our costs in providing you with details of the Information we hold about you.

## **13. HOW TO CONTACT US**

If you have any questions about this Privacy Policy or our Information-handling practices, or wish to review, amend or delete any Information we are storing, please contact us

