

## **PRIVACY POLICY**

*Last modified: August 30, 2021*

This Privacy Policy ("Privacy Policy") explains how BLBW LIMITED ("Company" or "we" or "us") collects, stores, uses, and discloses information from our users ("you") in connection with the mobile application in App Store "[VOCHI Video Effect Editor App](#)" and mobile application in Google Play "[VOCHI Video Effects Editor: Making Videos](#)" (collectively, the "Apps").

### **1. ACCEPTANCE OF PRIVACY POLICY. CHANGES TO PRIVACY POLICY**

This Privacy policy is an integral part of the Terms of service. By accepting the Terms of service, you also accept this Privacy Policy. In some cases, we may ask you to explicitly accept this Privacy Policy.

We reserve the right to and may periodically change, amend, or update this Privacy Policy. We will notify you by email, through the Apps, or by presenting you with a new version of the Privacy policy for you to accept if we make modifications that materially change your rights. Your continued use of the Apps after the effective date of an updated version of this Privacy Policy will indicate your acceptance of the Privacy Policy as modified. In some cases, we may ask you to explicitly accept the updated Privacy Policy.

### **2. PERSONAL DATA AND INFORMATION WE COLLECT**

When you download, install, and use the Apps, we may collect the following personal data and information:

- Email and/or Facebook login id (for login purposes).
- Location information (Country/Region);
- Demographics (Age and Gender);
- Interests/affinities within the Apps;
- Information about your device (description of a device that is used to access the Apps, for example, device ID, type of OS/Android, its version)
- Sessions (Completed Sessions across OS)
- Videos of User flow (including overlaid with Filters, Styles and Effects as defined in the Terms of service);
- Videos and photos made using the Apps (including overlaid with Filters, Styles and Effects as defined in the Terms of service);
- Information that is gathered about your use of the Apps (frequency of use, experienced problems, etc.) via cookies or similar technologies (for instance, through third party services like FireBase and Amplitude). We need such information in order to improve Apps functionality and technical stability. This section may include information about your interaction with Third-party services as defined in the [Terms of service](#)).

We do not collect your name, sex, age and other personal information, however, reserve our right to do so in the future granted we amend this Privacy Policy as stipulated by Section 1. We never collect any sensitive personal data about you.

The information covered by Sections 2 and 3 is de-identified and does not refer to any identified or identifiable natural person, we may use it for any business purpose, and per se does not qualify as personal data. To the extent information covered by these Sections is associated with an identified or identifiable natural person (if we, for example, start collecting identifiers that whilst linked to the Information will amount to personal data under applicable law) and is protected as personal data under applicable data protection laws, it will be referred to in this Privacy Policy as "Personal Data."

### **3. YOUR CONSENT**

By using the Apps, you explicitly consent that:

- I. WE MAY STORE AND PROCESS YOUR PERSONAL DATA AND INFORMATION FOR THE PURPOSE OF PROVIDING SERVICES TO YOU, TO IMPROVE OUR SERVICE FEATURES AND OTHER PURPOSES INDICATED IN SECTION 4 OF THIS PRIVACY POLICY. SUCH SERVICES MAY INCLUDE SENDING YOU INFORMATION AND REMINDERS THROUGH THE APP.
- II. WE WILL NOT TRANSMIT ANY OF YOUR INFORMATION TO THIRD PARTIES, EXCEPT IF IT IS REQUIRED TO PROVIDE THE SERVICE TO YOU (E.G. TECHNICAL SERVICE PROVIDERS), UNLESS WE HAVE ASKED FOR YOUR EXPLICIT CONSENT.

### **4. HOW WE USE YOUR INFORMATION**

We use all Personal Data and information to improve the Apps and deliver better experience. For example, we may analyze whether application of Filters, Styles and Effects on your video/photo was successful, whether it needs any improvement. Among others, we may use your Personal data and information to:

- a. analyze, operate, maintain and improve the Apps, to add new features and services to the Apps;
- b. provide and deliver the products and services you request, process transactions and send you related information, including confirmations and reminders;
- c. customize product and service offerings and recommendations to you, including third-party products and offerings;
- d. send you technical notices, updates, security alerts and support and administrative messages;
- e. monitor and analyze trends, usage and activities in connection with our Apps.
- f. we are collecting user data (photos and videos) only after confirmation from the user. Collected data is not linked to any personal information of a user. Data is uploaded to amazon S3 and only deviceID is linked to it.

- g. collected data can be downloaded or deleted by the user but only from the same device that was used while uploading. If a user is using more than one device, data uploaded from other devices won't be affected. We do not have a mechanism to identify all user devices.
- h. we have a data labeling department. Data labeling team is responsible for manually segmenting objects on videos and photos. Our company developed an internal data labeling tool to avoid any data transfer to 3rd parties. Labeled data is used to improve the quality of neural networks used in the mobile application for automatic object selection.
- i. we immediately remove all forbidden content as soon as possible. The process is as follows: if a data labeling engineer finds a photo or video that violates some rules he/she creates a ticket to remove data, data is immediately removed from the servers by the data engineer.

## 5. HOW WE STORE AND SHARE YOUR INFORMATION

All your Personal Data and information are stored and processed on our servers located in the European Union (Germany).

We do not share your Information with any third parties except as specified by this Privacy Policy.

We may share some of your information indicated in Section 2 of this Privacy Policy with the following third parties:

1. **FireBase.** FireBase is an analytical platform owned by Google that allows us to understand the Apps usage and user engagement. See more about FireBase's privacy policy [here](#);
2. **Amplitude.** Amplitude is a behavioral analytics product that is enabling us to see and analyze how you navigate through the App, what features you prefer the most, and how to improve your experience with the App. See more here about Amplitude's approach to privacy [here](#);
3. **Facebook.** Facebook is an online social media and social networking service owned by Facebook, Inc. that allows us to understand the Apps usage and user engagement, develop and improve our marketing campaigns, and better understand our users. See more about Facebooks privacy policy [here](#);

The above-mentioned third-party services are either EU-based or compliant with the GDPR (for example, EU-US Privacy Shield Framework that ensures that European data protection requirement are met). The privacy policy of these services can be found on their respective websites.

We may preserve and share your Personal Data in response to a legal request from a competent authority (search warrant, subpoena, court order). We may also preserve and share your Personal Data when we have a good belief that that is necessary for a legitimate purpose: like detecting fraudulent behavior in the App, in order to protect security of the App, and in other cases

You may choose to share your content (for example your videos with Masks and Effects) using our proprietary or third-party services. Please note that any such third-party services are not governed by this Privacy Policy. For instance, you may

choose to send an email to share your video using your Google account, then all applicable Google privacy policies will apply. When you access and use Third-party services via the Apps, we are not responsible for these Third-party services and we do not endorse or make any warranties and representations about such Third-party services.

## **6. DATA RETENTION AND SECURITY**

If you choose to delete the App, we may retain your Information for as long as your account is active and within a reasonable period thereafter in case you decide to re-activate the App, but normally no longer than 1 year.

We take all reasonable and appropriate measures to protect all collected Personal data and information from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. Among others, we utilize the following information security measures to protect your Personal data:

- a. Pseudonymization and tokenization of certain categories of your Personal Data;
- b. Encryption of your Information in transit and in rest;
- c. Systematic vulnerability scanning and penetration testing;
- d. Protection of data integrity.

Please understand that no security system is perfect and, as such, we cannot guarantee the absolute security of the App, or that your information won't be intercepted while being transmitted to us. If we learn of a security systems breach, we may post a notice, and will take reasonable steps to remedy the breach.

## **7. YOUR RIGHTS**

**Modification, correction and erasure.** You have a right to modify, correct, erase, and update your Personal Data by writing us at [hello@vochi.ai](mailto:hello@vochi.ai).

**Access.** You have a right to access your Personal Data you insert into the Apps and ask us about what kind of Personal Data we have about you. You can do this by using the Apps settings or by writing us at [hello@vochi.ai](mailto:hello@vochi.ai).

**EEA residents.** Individuals residing in the countries of the European Economic Area have certain statutory rights in relation to their personal data introduced by the General Data Protection Regulation (the "GDPR"). Subject to any exemptions provided by law, you have the following rights:

- a. **Rectification of Personal Data and Restriction of Processing.** You are responsible for ensuring the accuracy of your Personal Data that you submit to the App. If you believe that your Personal Data is inaccurate, you have right to contact us and ask us to correct such Personal Data by contacting us at [hello@vochi.ai](mailto:hello@vochi.ai). You shall also have the right to request restriction of processing of your Personal Data, if you contest the accuracy of the Personal Data and we need some time to verify its accuracy.
- b. **Access to your Personal Data and Data Portability.** You shall have the right to request information about whether we have any Personal Data about you, to access your Personal data (including in a structured and portable form) by simply writing us at [hello@vochi.ai](mailto:hello@vochi.ai).

- c. **Erasure of your Personal Data.** If you believe that your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or in cases where you have withdrawn your consent or object to the processing of your Personal Data, or in cases where the processing of your Personal Data does not otherwise comply with the GDPR, you have right to contact us and ask us to erase such Personal Data. You can simply write us at [hello@vochi.ai](mailto:hello@vochi.ai). Please be aware that erasing some Personal Data inserted by you may affect your possibility to utilize the Apps and its features. Erasure of some Personal Data may also take some time due to technical reasons.
- d. **Notification requirements.** We commit to notify you within reasonable period of time and your data protection authority within the timeframe specified in applicable law (72 hours) about any personal data breaches in the App.
- e. **Data Protection Authorities.** Subject to GDPR, you also have the right to (i) restrict our use of Personal Data and (ii) lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with GDPR.

Please keep in mind that in case of a vague access, erasure, objection request or any other request in exercise of the mentioned rights we may engage the individual in a dialogue so as to better understand the motivation for the request and to locate responsive information. In case this is impossible, we reserve the right to refuse granting your request.

Please note that we will grant your request within 30 days after receiving it, but it may take us up to 90 days in some cases, for example for full erasure of your Personal Data stored in our backup systems - this is due to the size and complexity of the systems we use to store data.

## **8. CHILDREN'S PRIVACY**

**General age limitation.** We are committed to protecting the privacy of children. The Apps are not intended for children and we do not intentionally collect information about children under 13 years old. The Apps do not collect Personal Data from any person the Company actually knows is under the age of 13. If you are aware of anyone under 13 using the App, please contact us at [hello@vochi.ai](mailto:hello@vochi.ai) and we will take required steps to delete such information and (or) delete her account.

**Age limitation for EEA residents.** Due to requirements of the GDPR you shall be at least 16 years old in order to use the App. To the extent prohibited by applicable law, we do not allow use of the Apps by the EEA residents younger than 16 years old. If you are aware of anyone younger than 16 using the App, please contact us at [hello@vochi.ai](mailto:hello@vochi.ai).

## **9. CONTACT US**

If you have any questions or concerns about your privacy, any provisions of this Privacy Policy or any of your rights, you may contact us at [hello@vochi.ai](mailto:hello@vochi.ai)