## **Privacy Policy**

Effective Date: Dec 13, 2022

Selfie-A-Day Ltd. (collectively referred to herein as "Selfie-A-Day", "we", "our" or "us"), recognizes the importance of protecting personal data we may collect from visitors and any other individual or entity ("Users", "you", or "your") who visit our web sites and who use our application. This Privacy Policy applies to data collection by Selfie-A-Day and shall apply to your use of Selfie-A-Day's applications, software, communications, capabilities and services ("Services").

Please familiarize yourself with our privacy practices and let us know if you have any questions. By using the Services, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services.

If you have any questions or comments about this Privacy Policy, please submit a request to <a href="mailto:contact@freezegun.com">contact@freezegun.com</a>.

## When this Privacy Policy Applies

Our Privacy Policy applies to all of the Services offered by Selfie-A-Day and its affiliates. Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

#### **Terms and Conditions**

By accessing or using the Services in any manner, you also agree to be bound by Selfie-A-Day's <u>Terms and Conditions</u> (the "Terms"). Please read the Terms carefully. If you do not accept all of the terms and conditions contained

in or incorporated by reference into the Terms, please do not use the Services.

#### Information We Collect

We collect information, including personal data, to provide better services to all our Users. We use the term "Personal Information" to refer to any information that identifies or can be used to identify you. Common examples of Personal Information include: full name, email address, digital identity, such as a login name or handle, information about your device, and certain metadata.

When you use our Services, we collect Personal Information in the following ways:

#### 1. Information You Give to Us

Certain information is required when creating an account to use our Services on our mobile applications, such as your name, email address and password. You can choose not to provide certain information, but then you may not be able to register for the Services or take advantage of some features of the Services.

#### 2. Information We Obtain from Your Use of Our Services

We collect information about your interaction with the Services, such as creating or logging into your account, or opening or interacting with the Services on Your mobile device. When you use our Services, we automatically collect and store this information in service logs. This includes: details of how you used our Services; internet protocol address; cookies that uniquely identify your browser, the referring web page and pages visited. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties.

When using our Services, we or our service provider may collect your unique device ID. We may use such information for internal purposes and to provide you a better experience, such as to troubleshoot application problems you may experience. We may associate device ID with Personal Information you provide to us. You may learn more about opt out of any anonymous device ID collection via the privacy settings available within your mobile device.

#### 3. Cookies and Similar Technologies

We and our partners use various technologies to collect and store information when you use the Services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third party advertising and analytics partners include Google and similar third party analytics partners.

The technologies we use for this automatic data collection may include:

<u>Cookies</u>. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services.

<u>Web Beacons</u>. Pages of our Services or our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count Users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Mobile Device Identifiers and SDKs. A mobile SDK is the mobile app version of a web beacon (see "Web Beacons" above). 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 or analytics to be performed.

#### 4. Network Advertisers

Third party companies that manage and deliver advertisements to websites and applications are commonly referred to as "network advertisers." A permitted network advertiser may use cookies, web beacons or similar technologies to collect information about your interaction with the Services or to tailor certain advertisements and content delivered within the Selfie-A-Day Services.

#### How We Use Information We Collect

We use your Personal Information in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

To present, operate or improve the Services;

To inform you about Services and products available from Selfie-A-Day; To authorize access to our Services;

To provide, maintain, administer or expand the Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;

To customize or tailor your experience of the Services, which may include sending customized messages;

To secure our Services, including to authenticate Users;

To use statistical information that we collect in any way permitted by law, including from third parties;

To respond to and support Users regarding their use of the Services;

To comply with all applicable legal requirements;

To enforce the Terms and other agreements;

To perform data analysis and testing;

To investigate possible fraud or other violations of our Terms or this Privacy Policy and/or attempts to harm our Users;

To resolve disputes;

To otherwise fulfill the purpose for which the information was provided.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

## Our Legal Basis for Collecting Personal Information

Whenever we collect Personal Information from you, we may do so on the following legal bases:

Your consent to such collection and use;

Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Services;

Our legitimate business interests.

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

Information We Share

We do not share Personal Information with companies, organizations and individuals outside of Selfie-A-Day unless one of the following circumstances applies:

**With Your Consent.** We will share Personal Information with companies, organizations or individuals outside of Selfie-A-Day when we have your consent to do so.

For External Processing. We provide Personal Information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include payment processors, such as financial institutions and their vendors and contractors that process transactions, marketing partners, and similar partners. It is our policy to only share Personal Information with contractors, service providers, technology partners, and other third parties who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.

For Legal Reasons. We will share Personal Information with companies, organizations or individuals outside of Selfie-A-Day if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to: (a) meet any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms, including investigation of potential violations, (c) detect, prevent, or otherwise address fraud, security or technical issues, and (d) protect against harm to the rights, property or safety of Selfie-A-Day, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their Personal Information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

**Business Transfers**. If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Information about our Users is often a transferred business asset. In the event that Selfie-A-Day itself or substantially all of our assets are acquired, Personal Information about our Users may be one of the transferred assets.

#### Non-Personal and Aggregate Services Use Information.

Selfie-A-Day may compile and share your information in aggregated form (i.e., in a manner that would not personally identify you) or in de-identified form so that it cannot reasonably be used to identify an individual ("De-Identified Information").

#### Your Failure to Provide Personal Information

Your provision of Personal Information is required in order to use certain parts of our Services. If you fail to provide such Personal Information, you may not be able to access and use our Services or parts of our Services.

#### Our Retention of Your Personal Information

We may retain your Personal Information for a period of time consistent with the original purpose for collection. For example, we keep your Personal Information for no longer than reasonably necessary for your use of our programs and Services and for a reasonable period of time afterward. We also may retain your Personal Information during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

We retain your Personal Information even after your relationship with us ends if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms, or fulfill your

request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed.

# Your Choices and Accessing, Updating or Deleting Your Personal Information

Subject to applicable law, you may obtain a copy of Personal Information we maintain about you or you may update or correct inaccuracies in that information by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

You may update or correct information about yourself by making changes to your profile by emailing us at <a href="mailto:contact@freezegun.com">contact@freezegun.com</a>. If you completely delete all such information, then your account may become deactivated. We may retain an archived copy of your records as required by law, to comply with our legal obligations, to resolve disputes, to enforce our agreements or for other legitimate business purposes.

By providing an email address, you agree that we may contact you in the event of a change in this Privacy Policy.

### Third Party Links

The Services may contain links to web pages operated by parties other than Selfie-A-Day. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Services or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have

their own privacy policies, which the User will be subject to upon linking to the third party's website. Selfie-A-Day strongly recommends that each User review the third party's terms and policies.

#### How We Protect Personal Information

Selfie-A-Day maintains administrative, technical and physical safeguards designed to protect the User's Personal Information and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Information.

If Selfie-A-Day collects account information for payment or credit, Selfie-A-Day will use the information only to complete the task for which the account information was offered.

#### Children

The Services are not intended for use by children. We do not intentionally gather Personal Information about visitors who are under the age of 13. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records.

## Direct Marketing and "Do Not Track" Signals

Selfie-A-Day does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

Selfie-A-Day does not disclose personal information to third parties for their direct marketing purposes.

## Changes to this Privacy Policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

#### How to Contact Us

If you have any specific questions about this Privacy Policy, you can contact us via email or by writing to us at the address below:

Send email to: <a href="mailto:contact@freezegun.com">contact@freezegun.com</a>