

PRIVACY POLICY

Last Updated: March 23, 2024

This Privacy Policy describes the collection and processing of information about you that can directly or indirectly identify you (the “**Personal Data**”) carried out by the mobile applications (the “**Apps**”) of Bigrowth OU (“**we**”, “**us**”, “**our**”). This Privacy Policy applies to all our Apps, the list of which may change from time to time, unless otherwise specified in a particular App.

Contact details of data controller:

Name: Bigrowth LTD

Address: Griva Digeni, 51 Athineon Court, Office 202, 8047, Paphos, Cyprus

E-mail: contact@bigrowth.io

Please read this Privacy Policy carefully as it contains important information about the following:

- How do we collect your Personal Data?
- How do we process your Personal Data?
- When can we share your Personal Data?
- How long do we retain your Personal Data?
- Do we use automated decision-making or refer to the automated profiling?
- What rights do you have?

We may update this Privacy Policy from time-to-time to keep it in conformity with the relevant legislation, including the Regulation of the European Parliament and of the Council (EU) 2016/679 (the “**GDPR**”) and California Consumer Privacy Act 2018 (the “**CCPA**”). We will keep you informed about the changes to our Privacy Policy. If we make any major changes to our Privacy Policy and will need your explicit consent for further processing of your Personal Data, we will request your consent or your renewed consent (in case it was obtained previously).

HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect Personal Data if you provide it to us or automatically by electronic means. If you contact us in messengers or social networks, we may also collect information about you available on such messenger or social network.

HOW DO WE PROCESS YOUR PERSONAL DATA?

We respect your privacy and aim to limit the Personal Data that we collect from you to the amount which is strictly necessary to fulfil the purposes of processing.

Categories of Personal Data that we process are specified below:

Purpose of the processing	Personal Data	Legal basis for the processing
<i>To ensure proper use of the Apps, including the ability to monitor and troubleshoot technical issues</i>	<ul style="list-style-type: none">• Technical data such as IP address, device ID, general location data, device model, date and time of access (the “Technical Data”)	Terms of Use <i>* Without providing this data you will not be able to use the Apps</i>

	<ul style="list-style-type: none"> • Usage experience, i.e. information about your use of the Apps (the “User Data”) 	
<i>To communicate with you</i>	<ul style="list-style-type: none"> • E-mail, <i>or</i> • Phone number, <i>or</i> • Any other information that you have made public in the messengers or social networks you used to contact us at the time of contacting us (name, photo, etc.) * <i>depending on what way of communication you choose</i> • Information that you provide us when you contact us 	Our legitimate interest in receiving communication from you and reacting to it and your interest in getting our response
<i>To manage and optimize users’ experience by improving our knowledge of our users</i>	<ul style="list-style-type: none"> • Technical Data • User Data 	Our legitimate interest in evaluating and creating statistics on the use of the Apps and your interest in the Apps updates which will be tailored to your needs
<i>To provide you with advertising, including that is relevant to your interests</i>	<ul style="list-style-type: none"> • Technical Data • User Data 	Our legitimate interest based on the balance of interests while you have absolute right to object to direct marketing

Profile Data

Some of our Apps may offer you to create an account within the App. When you create an account, we will process the information we request from you to register your account (such as your email address). We only ask for information necessary to identify you to the system. We may also allow you to complete your profile in the App by providing additional information, but please not that this is always optional. The basis for Personal Data processing is your consent which you give when you fill in the relevant data.

Third-Party Platform Data

Some of our Apps may give you the option to link to or log in to your account in the App through your account on a Third-Party Platform such as Instagram, Facebook, etc. (the “**Third-Party Platform**”). In this case we will process your Third-Party Platform account’s data that you have made available to us in accordance with privacy setting of your Third-Party Platform account. The basis for data processing is your consent which you give when you link to or log in to your account in the App through your account on a Third-Party Platform.

Payment Data

Your payment data is processed by the app store which you downloaded the relevant App from.

User Content

We use your User Content only within the provision of the Apps functionality to you.

WHEN CAN WE SHARE YOUR PERSONAL DATA?

We can share your Personal Data with third parties only in the cases listed below:

When we are required by law: We may disclose your Personal Data to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies), in connection with any legal proceedings or prospective legal proceedings and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

With our partners who help us support the Apps: We may have partners that help us to make the Apps better, including analytics and advertising partners which may process your Technical Data and some User Data for analytical and advertising purposes respectively.

The list of our analytics and advertising partners:

- **Google Analytics.** Google Analytics is a web analytics service provided by Google, Inc. Address: Google, Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA, [Privacy Help Center](#). [Privacy Policy of Google Inc.](#);
- **Google Firebase.** Google Firebase is a mobile and web app development platform that offers several integrated features such as a mobile app server, analytics tools, app promotion and monetization tools provided by Google, Inc. Address: Google, Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA, [Privacy Help Center](#). [Privacy Policy of Firebase](#);
- **Amplitude.** Amplitude is a service for analyzing user behavior on the web and mobile applications provided by Amplitude, Inc. Address: to the attention of Privacy, 631 Howard Street, Floor 5, San Francisco, CA 94105, USA, privacy@amplitude.com or ccpa@amplitude.com. [Privacy Policy of Amplitude, Inc.](#);
- **AppsFlyer.** AppsFlyer is a SaaS mobile marketing analytics and attribution platform provided by AppsFlyer. Address: to the attention of Legal Team/Data Protection Officer, 14 Maskit St., Herzliya, Israel, 4673314, privacy@appsflyer.com. [Privacy Policy of AppsFlyer](#);
- **AppLovin.** AppLovin is a technology platform enables developers to market, monetize, analyze, and publish their apps provided by AppLovin Corporation. Address: to the attention of Data Protection Officer, AppLovin Corporation, 1100 Page Mill Road, Palo Alto, CA 94304, dataprotection@applovin.com. [Privacy Policy of AppLovin Corporation](#);
- **Facebook Ads.** Facebook Ads Manager is a Facebook tool that allows to create and manage ads provided by Meta Platforms, Inc. Address: 1601 Willow Road, Menlo Park, CA 94025, USA. [Privacy Policy of Meta](#);
- **Google Ads.** Google Ads is a contextual advertising service from Google, Inc. Address: Google, Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA, [Privacy Help Center](#). [Privacy Policy of Google Inc.](#)

Please note that some of these companies may be located outside the EU (international data transfers) including in the countries which do not ensure an adequate level of protection of your Personal Data. Where this is the case, we meet the strict conditions of Personal Data transfers from the member states of European Union to other countries by using the Standard Contractual Clauses (SCC) adopted by the European Commission to ensure that Personal Data are properly protected or

relying on other derogations compliant with GDPR. In case you want to check the relevant SCC, the links to them are provided below:

- **Google Analytics.** Transfer to the USA and Singapore is based on [Google Ads Controller-Controller Data Protection Terms](#) and [Google Ads Data Processing Terms](#);
- **Google Firebase.** Transfer to the USA and Singapore is based on [Google Ads Controller-Controller Data Protection Terms](#) and [Google Ads Data Processing Terms](#);
- **Amplitude.** Transfer to Amplitude, Inc is based on [Amplitude Data Processing Addendum for Terms of Service](#);
- **AppsFlyer.** Transfer to Amplitude, Inc is based on [Data Processing Addendum of AppsFlyer](#);
- **AppLovin.** Transfer to AppLovin Corporation is based on [Applovin Data Processing Agreement](#);
- **Facebook Ads.** Transfer to the countries specified [here](#) based on the [Data Processing Terms](#) and [Facebook European Data Transfer Addendum](#);
- **Google Ads.** Transfer to the USA and Singapore based on [Google Ads Controller-Controller Data Protection Terms](#) and [Google Ads Data Processing Terms](#).

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your Personal Data for no longer than it is necessary to fulfill the purposes specified in the section “How do we process your Personal Data”. Except for any legal obligation that sets a longer data retention period, at the end of these periods, the Personal Data processed will be deleted or anonymized.

DO WE USE AUTOMATED DECISION-MAKING OR REFER TO THE AUTOMATED PROFILING?

We neither use automated decision-making nor refer to the automated profiling.

WHAT RIGHTS DO YOU HAVE?

Rights of EU residents:

- (1) **The right of access** to your Personal Data meaning that you can receive a copy of the Personal Data that we hold about you, as well as other supplementary information.
- (2) **The right to rectification** of your Personal Data which is incomplete or inaccurate.
- (3) **The right to erasure** of your Personal Data meaning that you can ask us to delete or remove your Personal Data in certain circumstances. Note, that we can retain your Personal Data as necessary to comply with our legal obligations or resolve disputes. If we have no grounds to continue processing your Personal Data, we will delete or remove it and notify you about such deletion or removal.
- (4) **The right to restrict processing** of your Personal Data if (a) the accuracy of the Personal Data is contested by you, (b) the processing is unlawful and you oppose the erasure of the Personal Data, (c) we no longer need the Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims, and (d) you have objected to processing pending the verification whether the legitimate grounds override this.
- (5) **The right to data portability.** The right to portability of your Personal Data, which applies only to information we have processed based on your consent or Terms of Use.
- (6) **The right to object to the processing** of your Personal Data where we are relying on a legitimate interest and there is something about your particular situation that makes you want to object to the processing on this ground. We will no longer process the Personal Data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

(7) **Right to withdraw consent** at any time where we are relying on the consent to process your Personal Data. If we have no other grounds for processing your Personal Data, after you send us a request to withdraw consent, we will stop processing your Personal Data that we were processing under your consent.

We will address your request as early as possible and no longer than within 1 (one) month. Please note that this period may be extended by 2 (two) further months where necessary, taking into account the complexity and number of the requests. In this case, we will inform you of the extension within 1 (one) month of receipt of your request and will explain you the reasons for the delay.

Rights of California residents:

(1) **The right to opt out.** Under the CCPA each California resident can request business stops selling Personal Data to third parties.

Do we actually “sell” Personal Data? We do not, and will not, provide your Personal Data in direct exchange for money. Therefore, in the literal sense, we do not sell your Personal Data.

(2) **Other rights.** You also have a right to be informed about what categories of Personal Data we are collecting: you can request us to disclose what Personal Data we have collected in the past 12 (twelve) months and right to get a free copy of your Personal Data disclosed in a readily usable and readable format. You can also request us to delete the Personal Data we have collected in the past 12 (twelve) months. We will not discriminate against you for exercising any of your rights granted under CCPA.

Mandatory Verification: As required by CCPA we will need to verify your identity before processing your request. In order to verify your identity, you will be asked to log in to your account or (if you do not have an account) we will try to match the information you provided with the information we handle about you. In certain circumstances, we may decline the request, mainly where we are unable to verify your identity, for example, if you have requested us to delete your Personal Data.

As required by CCPA we endeavor to respond to a verifiable request within 45 (forty-five) days of its receipt. If we require more time (up to 90 (ninety) days), we will inform you of the reason and extension period in writing. We will deliver our written response by e-mail.

How to exercise any of your rights? You may exercise your rights by sending a relevant request to the e-mail indicated in the contact details.

If you have any comments about how we process your Personal Data, please let us know and we will consider your claim. If you are not satisfied with our response to the complaint, you have the right to file a complaint with the competent authority.

AGE LIMITS.

We do not knowingly collect or solicit your Personal Data to anyone under the age of 13 (16 – in European Economic Area) or knowingly allow such persons to use the Apps. If you are under the age of 13 (or 16, where applicable), please do not provide any Personal Data to us. If we learn that we have collected Personal Data about a child under the age of 13 (or 16, where applicable), we will delete that Personal Data as soon as possible. If you believe that we might have any Personal Data from or about a child under the age of 13 (or 16, where applicable), please contact us at the e-mail indicated in the contact details.