Privacy Policy
Effective date: November 30 2018
Last modified: November 30 2018

General Words

This Privacy Policy describes Smoozly data practices regarding the collection, use, disclosure of the information that applies to Smoozly’s App as Well as choices available to You regarding Smoozly using of User's information ("Data"). When We say “User” or “You” We mean everyone, who somehow uses the Services. Smoozly hereinafter referred to as the “Company”, “Smoozly”, “App”, “We” or “Our”. Here are the rules, User definitely has to follow and agree with, in order to use Smoozly.

If You do not agree to all of the terms and conditions of these Privacy Policy or Smoozly Terms of Services, or You do not have such authority, or do not meet the eligibility requirements, You should cease any and all access or use of the Smoozly Services.

1.Data We Process When User Use Our App

1.1. Personal Data and Automatic Collection. We do not collect or store Your Personal Data while Your using the App. All We collect and store is information for analytics, statistics, customer research purposes, using third party analytics tool -- Analytics Amplitude. This service enable Smoozly to monitor and analyze traffic and can be used to keep track of User behavior and usage trends. Some of this information will be processed automatically when installing Our App on Your device The following is Statistics Data.

We automatically collect Your IP address, Your device unique ID, operating system, the version of application, downloaded on Your device; time when You open and close the App; the errors, which may occur during Your use of the App.
We may use this information to, among other things, help diagnose problems with our servers, analyze trends, resolve bugs and gather information for aggregate use. We do collect it every time, when You use the Services. We see how much time You spend using Services and when just to adjust our App and make it as user friendly as possible.

As with most App and technology services delivered over the Internet, our servers automatically collect information when You access or use the App and record it in log files. This log data include App version, when the App was launched, when was closed, Your actions in the App, crash reports and operation system, technical messages. This is needed to support the normal functioning of the App on Your device with minimum service errors.

1.2. Information You Provide to Smoozly Directly. If You correspond with Us and provide Your personal Data directly, We can keep it for customer support needs. If You sign up for email mailing list, We will collect Your email. Users are responsible for any third-party Personal Data obtained, published or shared through the Smoozly and confirm thy have the third party’s consent to provide Data to the Smoozly.

2. Methods of Processing
2.1. The Smoozly takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. Depending on the User's specific device, Smoozly may request certain permissions that allow it to access the User's Device Data. By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, User may refer to the device settings or contact the Owner for support at the contact details provided in the present Privacy Policy. The exact procedure for controlling App permissions may be dependent on the User's device and software. Please note that the revoking of such permissions might impact the proper functioning of Smoozly. If User grants any of the permissions listed below, the respective Data may be processed (i.e. accessed, modified or removed). When User interact with us on using Our App, User can submit Data to Us in various situations:

2.2. **User Submissions**: When You submit content throughout the App or via Smoozly’s contact details.

2.3. **Customer Support Data**: User can communicate with Smoozly by using the specified email address of Our customer support team for requests on technical assistance or otherwise reach out to Our customer support team. In order to respond to Your request, We will process Your Contact data as well as the contents of Your request. Once Your request has been complied, We will delete this data pursuant to Our data retention period described below.

2.4. **Transaction Data**: If User make any purchases of subscription on Our App, We will not process any of Your contact and billing information, such as Your name, address, and credit card information. This Data is processed by App Store itself and needed to complete Your order, for billing purposes, and for internal accounting. This is not governed by this Privacy Policy.

2.5. **Survey Data**: We strive to improve Our services to You, from time to time We may conduct surveys in respect of Our services, features or products on Our App. Please note that any participation in Our surveys is optional. However, if User respond to one of Our surveys, User may provide us with personal information. Unless User otherwise consent, We will only use this information for specified purposes which User will be duly notified.

2.6. **Photo Access Permission**

Applicable when App requires the first time permission, accessing the photo library to capture images and video from the device for using in the App.

3. Place

The Data is processed at the Smoozly’s operating offices and in any other places where the third parties involved in the processing are located.

4. The purposes of processing

The Data concerning the User is collected to allow the Smoozly to provide its Services, as well as for the following purposes: Content performance and features testing (A/B testing), Infrastructure monitoring, Authentication, Analytics and Contacting the User.

5. The rights of Users
Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:
- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- Access their Data. Users have the right to learn if Data is being processed by Smoozly, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, Smoozly will not process their Data for any purpose other than storing it.
- Have their Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner. In this case, Smoozly may limit access to the App.
- Users have the right to receive their Data commonly used and machine readable format. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

6. Sharing Data with Third Parties

We treat Your Data with care and confidentially and will only pass it on to third parties to the extent described in the Privacy Policy and not beyond. We do not share, sell, rent, or trade Data with third parties for any promotional purposes. Where our affiliates, resellers, or service providers process Data, they will do so solely on Our instructions and have undertaken to comply with strict contractual requirements for the security of Your Data.

7. Third Party Service Provider

Smoozly transmits data to service providers that enable us to provide Our App, market, sell, payment process and delivery. This includes the parties providing Our third-party tracking tools, as well as parties providing us with services to assist us in processing transactions, including credit card transactions (made by App Store), and processing of orders, providing customer support, managing customer relationships, hosting, collecting, storing, or removing Your information, or performing statistical analysis, providing marketing assistance, investigating fraudulent activity, technical and customer support, perform tracking and reporting functions, conduct quality assurance testing, providing customer service, customer surveys, and other services in connection with the App. We sometimes need to share Your information with these third parties in order for them to provide the applicable services.

8. When Purchasing at our Smoozly App
Smoozly App acts as a gateway for User to make purchases via the App. In App subscription trial removal that are initiated from Our Smoozly App are actually completed on Apple App Store.

9. Public Authorities

Although We make every effort to preserve User Privacy, We may need to disclose personal information when required by law, such as when We have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order, or litigation or other legal process or action (whether or not initiated by Smoozly) to protect Smoozly's, Our users' or third parties' rights, property or safety. We will transmit data to public authorities such as law enforcement or tax authorities only in the case of a legal obligation to do so based on a request for information from the respective authority.

10. Children's Privacy

Our Service do not cater for minors. We strongly advise that this service is cater for individual who are 18 years and above, otherwise, We request a parental /guardian express consent for User to continue using Our service or by writing to us via our contact details specified below. If, via notice, any user information relating to minors was on our record, We will deactivate minor's account and take reasonable measures to promptly delete such information from Our records.

11. How can User Manage Information About Yourself

We provide User with the ability to access, rectify, update and erase Your data on Smoozly App. For ability to access, rectify, update and erase Your data please email us at via our contact details specified below or for any other enquiries relating.

12. Time Frame for Keeping Data (Data Retention Period)

Data collected via User App Usage Data will be automatically deleted after two years from date of receipt of Data. However, these data may be retained on a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs longer than two years.

13. How do We operate and transfer

We share information globally, both internally within Smoozly and externally within our partners. Your information may, for example, be transferred or transmitted to, or stored and processed in the Ukraine or other countries outside of where User live for the purposes as described in this policy. We rely on European Commission's guidelines and decisions about certain countries, as applicable for these data transfers to the Ukraine and other countries.

14. Changes to this privacy policy
Smoozly reserves the right in its sole discretion, modify or update this Privacy Policy from time to time, and so You should review this page periodically. When We change the policy in a material manner, We will update the ‘last modified’ date at the bottom of this page.

15. What Happens in the Event of a Change of Control

We may buy or sell/divest/transfer the Company (including any shares in the Company), or any combination of its products, services, assets and/or businesses. Your information such as email addresses, User Content, and other User information related to the Service will likely be among the items transferred in these types of transactions. We may also transfer or assign such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions or similar transactions or proceedings. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the Company.

16. Compromise of Information

In the event that any information under Our control is compromised as a result of a breach of security, Smoozly will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

17. Inquiries

Interested parties acknowledge agreeing to this Privacy Policy, and Terms of Services. This document is subject to change and must be accompanied by reading of Terms of Services. If User have any questions about this Privacy Policy or any complaints or comments on how the Company handle Your information related to the Services, please contact us.

CONTACT INFORMATION
E-mail: hi@smoozly.com
Registered Smoozly