

# Privacy Policy

Effective Date: May 1, 2018

ElephantData Ltd. (“we”, “us”, “our” or “ElephantData”) is a data analysis company. We provides a software development kit which allows the tracking of mobile application use, installations, downloads etc. In order to provide the services, we collect and use certain information about user activities in mobile applications. This Policy explains how we collect, use and share information through our services, as well as your choices related to that information.

## Information Collection and Use

If you are a consumer that downloads and uses an application which contains our SDK or otherwise interacts with the services, we may collect certain device information including the following:

- Information about users’ device and network including CPU core number, RAM, ROM, network type, screen size, Geo, model of the device.

We may use the information we collect only for the following purposes:

- To operate and improve our services;
- To find out the reason why the error occurred or application crashed and improve the quality of the application;
- To better understand how users access and use the application;
- To help us develop new services.

We do not collect or disclose any sensitive personal information (e.g. information related to racial or ethnic origin, political opinions, religion or other beliefs, age, health, sexual orientations).

## Information Sharing

We do not sell, trade or otherwise transfer to outside party users’ personally identifiable information.

We may disclose users’ non-personal information to trusted third party who assist us in operating our website, conducting our business, cooperation with us or servicing company, so long as those parties agree to keep this information confidential.

## Children’s Online Privacy Protection Rule

We do not knowingly collect personal information from children under the age of 13 except as permitted by law.

## **Data Security**

We have implemented reasonable physical, technical and administrative security measures to help protect information we collect and store.

## **Specific Provisions for EU Individuals**

If you are located in the European Union, the following provisions apply to you.

On certain occasions, we process your personal data when it is necessary for the performance of a contract to which you are a party, such as to provide services to you. We may also process your personal data to respond to your inquiries concerning our products and services.

On other occasions, we process your personal data where required by law. We may also process your personal data if necessary to protect your interests or the interests of a third party.

Additionally, we process your personal data when necessary to do so for fraud prevention and improving our services, where these interests are not overridden by your data protection rights.

If the processing of personal data is necessary and there is no other lawful basis for such processing, we will generally ensure that consent has been obtained from you. You have the right to withdraw your consent to processing of personal data at any time.

## **Children**

We do not knowingly collect personal information from children under the age of 16 through the services.

## **Your Rights**

If you are an individual in the EU, you may be entitled:

- To request access to the personal data we hold about you;
- To request that we rectify or erase your personal data;
- To request that we restrict or block the processing of your personal data; Under certain circumstances, to receive personal data about you that we store and transmit to another without hindrance from us, including requesting that we provide your personal data directly to another, i.e., a right to data portability;
- Where we previously obtained your consent, to withdraw consent to processing your personal data.

All requests will be dealt with at the earliest opportunity.

Additionally, you have the right to lodge a complaint against us. To do so, contact the

supervisory authority in your country of residence.

### **Policy Changes**

We may, in our sole discretion, make changes to the Policy from time to time in order to accommodate new technologies, industry practices, regulatory requirements, or for other purposes. By continuing to use our services following such changes, you are agreeing to accept the terms of the revised Policy.

### **Contact Us**

If you have any questions or comments about this Policy, please contact us via email at [service@elephantdata.net](mailto:service@elephantdata.net) . Please be sure to include your name, address and email address in any correspondence to us so that we can respond to your inquiry in a timely manner.