

## PRIVACY NOTICE

Last Updated: November 6, 2020

Welcome to 80 Degree Photo Studio! 80 Degree Photo Studio offers a number of mobile software applications (each, an "App") to edit and perfect photos, create images, edit videos and share your creations through social media and email.

This Privacy Notice (the "Notice") describes how we collect, use, store and otherwise process personal data that we collect or receive from or about you. Accordingly, this Notice is a master privacy notice, and references herein to the "Service" shall mean the App collectively and/or individually (as the case may be). Moreover, some of its provisions only apply to individuals in certain jurisdictions (for example, the sub-paragraphs titled 'Legal Bases' are only relevant for GDPR-protected individuals).

For purposes of this Notice: (a) "personal data" or "personal information" means any information that can be used, alone or together with other data, to uniquely identify any living human being; (b) "GDPR" means Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data (General Data Protection Regulation); and (c) "CCPA" means the California Consumer Protection Act of 2018.

### PERSONAL DATA WE COLLECT OR RECEIVE

When you contact us

When you contact us (for example, to inquire about our products or services), we collect whatever personal data you provide us, such as name, telephone number and email address, as well as the question or issue you raised (collectively, "Contact Information").

When you download an App

When you download an App, we receive whatever information the applicable App Marketplace shares with us.

If you make purchases within the Services

If you choose to subscribe to one of our paid Services or to purchase items. Currently, for purchases made via an App, the applicable App Marketplace collects the Billing Information. We receive whatever information the applicable App Marketplace shares with us.

Information we do not collect from you

- Photo Image. Photo image is processed on your device only. We do not collect or store your photo image.
- Video. Video is processed on your device only. We do not collect or store your video.

Information we may receive from you automatically

- IP Address. When you access the Services or make purchases through the Services (such as a subscription), we may receive your IP address.

### OTHER SOURCES OF PERSONAL DATA

Some of the personal data mentioned above is collected or received directly from you; however, some of the personal data is obtained by us from third party sources.

An example of third-party sources might be vendors of products and services (“Vendors”), such as the following analytics Vendors we engage in connection with the Services:

1. Facebook; Facebook's privacy policy is available [here](#).

These Vendors may also collect your personal data through their respective Tracking Tools incorporated or embedded within our Services. We use their services for the purposes set forth below.

Another example of personal data obtained from third party sources, is if you choose to link or sign up to the Services through your social network account (such as Facebook, Twitter, Instagram, or Google), we may receive personal data from these third-party services, and information relating to your use of the Services in relation to those third-party services.

## HOW WE USE PERSONAL DATA

We use your personal data to operate, provide, and enhance the Services

We use the personal data and other information that we collect or receive for the following purposes:

1. To operate, provide, and maintain the Services;
2. To bill users of paid Services or items, and for conducting internal and external financial audits; and/or
3. To detect or prevent fraud.

Legal Bases (GDPR-only): The legal bases for processing and collecting this personal data and information for the above purposes, may be one or more of the following: (a) your consent; (b) our legitimate interest in operating our Services, as well as ongoing management and development of our business; (c) contractual necessity, such as performing under the Terms of Use or other contracts (as well as in order to take steps at your request prior to entering into a contract); and (d) legal obligation, such as retaining invoice information of our paid subscribers to comply with financial regulations.

We use your Contact Information to send you promotional emails relating to your inquiry  
If you contact us with an inquiry, we may respond with promotional emails relating to your inquiry. For example, if you contact us with an inquiry about a Feature you would like to see on one of our Services, we will use your Contact Information to later inform you once our Services have been updated to include Features similar to those you inquired about or other Features you may be interested in.

You may opt-out of these email updates by following the unsubscribe link located at the bottom of the email.

Legal Bases (GDPR-only): The legal basis for using your Contact Information for this purpose is our legitimate interest in promoting our Services and our business, in response to your inquiry.

## WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS

We will not share your personal data with third parties, except in the events listed below or when you provide us your explicit and informed consent. Sharing will almost always entail transferring a copy of the personal data.

Within our corporate group entities

We may share your personal data with our Affiliates. This may be for the purpose of storing such personal data on our behalf, or for other processing needs that we wish to delegate to such Affiliates. These Affiliates may be based in other countries, and their servers may be located anywhere in the world. Such transfers will be covered by an internal processing agreement entered into by such Affiliates (an intra-group agreement) which contractually obliges each Affiliate to ensure that personal data receives an adequate and consistent level of protection wherever it is transferred to.

With service providers who assist us in operating our business and the Services

We will share your personal data with third party service providers who assist us to operate our business and/or the Services (for example, Vendors and advertising networks). Our service providers are authorized to use your personal data only as necessary to provide us with their services and not for their own purposes. We do not sell your personal data to such third parties. These third parties may have their own privacy policies that they adhere to (so they won't necessarily adhere to this Notice); however, we do try to engage third parties that post a privacy policy.

If we are legally required to do so

If we are bound to disclose your personal data by a judicial order or by a governmental or regulatory authority, we will comply and share the personal data with that body.

## THIRD-PARTY SERVICES

Please be aware that while using the Services, you may be directed (via hyperlinks or other means) to, or be able to interact with, third-party websites, apps, services and online communities that are not affiliated with us (such as Facebook, Instagram, and LinkedIn). Moreover, if the Services integrate with a third-party service, the application programming interface (API) that performs the integration will enable the relevant third party to serve you certain content as well as access some of your Account Content. For example, if you wish to upload or otherwise share your Account Content to an integrated third-party service such as Instagram or TikTok, or to make use of certain functionality in those services, the API will enable the applicable third party to access your Account Content (such as your photo library). Additionally, when you pay for fee-based Services or items, your payment will be processed by third party payment processors, such as Google's or Apple's in-app purchase mechanism. Any personal data you provide in connection therewith is provided to the applicable third party.

We do not control, and are not responsible for, the privacy practices of such third parties, or for their content, products and services, and we encourage you to read the terms and conditions and privacy policies of each third party that you choose to use or interact with.

## SECURITY AND DATA RETENTION

Where we store your personal data

80 Degree Photo Studio may store the contact information when you contact us via email. The market information is stored in the applicable App Marketplace.

We do not collect or store the data of the App usage.

## INTERNATIONAL DATA TRANSFERS

We will transfer your personal data to third countries only in accordance with applicable data protection laws.

## YOUR RIGHTS

You have the right to access, update or delete your personal data and obtain a copy of your personal data

Please contact us at [wintaptap@gmail.com](mailto:wintaptap@gmail.com) if you would like to make such requests.

Please know that we do not collect or store your personal data of the App usage. Please note that in certain circumstances, we may not be the party which holds your personal data, and we may refer you to the party (such as the App Marketplace) which does.

## CONTACT US

If you have any questions about this Notice, or how we process your personal data, please contact us at: [wintaptap@gmail.com](mailto:wintaptap@gmail.com).