

PRIVACY POLICY

Introduction

This Policy is intended to help you understand:

- why we collect your personal data;
- how we collect, use and store your personal data;
- which rights relating to your personal data you have;
- how you can exercise the rights relating to your personal data;
- how we use cookies and other tracking technologies;
- how we share and disclose your personal data;

Dreamezer is owned and operated by Individual Entrepreneur **Medvediev Anton**, registered and acting under the laws of Ukraine, registration number 3521309992.

Dreamezer (“we”, “us”, “our”, “Company”, “Dreamezer”) cares for your privacy and therefore provides you with the information hereunder. On this page, you can learn what information about you we collect while you interact with Dreamezer, what for and how it is used, stored, disclosed etc., as well as how we process personal data you provide us with.

This Privacy Policy (“Policy”) describes how we handle the data you provide us with through our application available at iOS App Store: <https://apps.apple.com/us/app/dreamezer/id1559988409>, Google Play Store:

<https://play.google.com/store/apps/details?id=com.medvediev.dono>

(“Application”) (hereinafter collectively referred to as “Platform”) or by interacting with us in other ways available on the Platform. Such treatment may include without limitation the following:

- collection;
- recording;
- organisation;
- storage;
- structuring;
- adaptation;
- alteration;
- retrieval;
- consultation;
- use;
- disclosure by transmission;
- dissemination or otherwise making available;
- alignment or combination;
- restriction; and
- erasure or destruction.

When processing your personal data Dreamezer acts as a data controller under the GDPR.

When you submit your personal data as a customer through our Platform, you may be asked to consent to our processing of the personal data you provide as explained in this Policy to enable us to provide you with the information or service requested, if no other legal ground can be used. We won’t use your refusal to consent to prevent you from using our Services, but you may be limited in access to some features of the Services.

Definitions

To facilitate your understanding of this Policy, we explain the usage of the definitions listed here in accordance with the GDPR.

We use the following definitions in this Policy:

“*data controller*” means the natural or legal person who (either alone or jointly with other persons) determines the purposes for which and the manner in which any personal data is processed.

“*data processor*” means the natural or legal person who processes personal data on behalf of the data controller.

“*data subject*” is any living individual who is using our Platform.

“*personal data*” means any information relating to you and helping identify you (directly or indirectly) such as your name, surname, email, date of birth, etc.

“*processing*” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“*services*” means access to and/or use of the functionalities of the Platform described in our [Terms of Use](#).

Data Collection

We collect and process the information about you or obtained from you in accordance with this Policy.

We act as a controller in relation to the different categories of personal data.

We collect the information from you through the registration form and in your Account in the Application, on the Site, via means of communication available on the Platform and process it as a data controller.

We use your personal data we collected only for the purposes listed in this Policy. We may share your personal data with third parties solely for purposes listed herein.

We do not sell your data. We DO NOT use automated decision-making and profiling that may have legal or similar significant effects on you.

Use of Your Personal Data

When acting as a data controller, we use your personal data for the purposes listed in the table below where we also detail the type of personal data processed, legal bases we rely on to do so, third parties with whom we may share your personal data and information as to source of such data:

Purposes	Type of personal data	Legal grounds	Third Parties recipients	Source
Registration in the Application	<u>Registration Data</u> : name (or full name) or username, email, date of birth, photo. <u>Information from Identification token</u> : name, surname, email.	Performance of a contract (Article 6(1)(b) GDPR).	Google Platform	Cloud (USA) User, Google/Apple account

Maintenance of the account on the Platform Registration Data: name (or full name) or username, email, date of birth, photo. Performance of a contract (Article 6(1)(b) GDPR). Google Platform (USA) Cloud User, Google/Apple account

Information from Identification token: name, surname, email.

Fraud Prevention Registration Data: name (or full name) or username, email, date of birth, photo, history of visits, device model. Our legitimate interest (Article 6(1)(f) GDPR). Google Platform (USA) Cloud User, Google/Apple account

Information from Identification token: name, surname, email.

To enable the functionality of the Site and to enhance user experience in relation to language preferences Country of residence of Our legitimate interest (Article 6(1)(f) GDPR). Google Platform (USA) Cloud User

To communicate with users regarding our services Message information (any information if it contains personal data) Performance of a contract (Article 6(1)(b) GDPR). Google Platform (USA) Cloud User

To inform users of new features, updates and change of fees Email, name or username or Our legitimate interest (Article 6(1)(f) GDPR or your consent to receive marketing emails (Article 6(1)(a) GDPR) Google Platform (USA) Cloud User

Please note that for the purpose of payment for our services we use the services of third party service providers which provide the opportunity of processing payments. Such payment providers may collect certain personal data they consider necessary for provision of their services. We are not responsible for their collection and processing of your personal data and such collection of personal data is regulated

under the rules and policies of such payment processors. We advise you to access the payment processors' websites carefully and always check their policies and rules regarding the collection of your personal data.

In particular, we use the following payment processors for the purposes of payment for our services:

- Google Pay: you may familiarise yourself with their privacy notice [here](#);
- Apple Pay: you may familiarise yourself with their privacy policy [here](#).

Cookie Policy

Cookies are small text files containing information that websites send to your browser. They are stored on your device, which might be a personal computer, a mobile phone, a tablet or any other device.

We use them to enhance your user experience.

We use cookies and other tracking technologies on our Site to enable the functionality of the Site, enhance user experience and to understand the online behaviour of people who interact with our Site. We use them on the basis of our legitimate interest to ensure a smooth operation of the Site.

We use the following cookies:

Category: Necessary

Cookie Name	Provider	Type	Purpose	Retention Period

If you do not want cookies to be installed, you can opt out using your browser settings. However, absence of these cookies may greatly impact your ability to access the Site or get a smooth experience of using the Site. These cookies are not used to collect analytics or marketing data.

Grounds for processing

Our grounds for processing your personal data are:

- our legitimate interests;
- performance of a contract;
- our legal obligations.

We collect and process your personal data in accordance with the provisions of the GDPR.

The GDPR provides an exclusive list of lawful bases allowing us to process your personal data, namely:

Article 6.1(a), 9(2)(a): consent

If collection and processing of your personal information requires obtaining your consent, you may withdraw your consent to the processing of your personal data at any time. Please remember that the withdrawal of consent does NOT automatically mean that the processing before the withdrawal is considered unlawful.

You may withdraw the consent to the processing of your personal data by sending us an email at aimedvediev@gmail.com or by contacting us by other means of communication available on the Platform.

Article 6.1(f): legitimate interests

We process your personal data to prevent any fraudulent actions and to provide you with the desired services. Also, we need some data to enable our Site to run smoothly and give you a pleasant user experience. We use only strictly necessary data under this legal ground.

Article 6.1(b): performance of a contract

We require the minimum amount of your personal data that is necessary to provide you with our services.

Article 6.1(c): legal obligation

We may process your personal data to fulfil the applicable legal obligations arising mainly from the GDPR. In the event of you sending us the request to fulfil the rights granted by the GDPR, we may ask you for some personal data we already have to identify you and achieve compliance with the applicable law.

Data Subject Age

We undertake best possible efforts to secure the processing of personal data belonging to the underage.

The Platform does not knowingly collect personal data from persons under the age of 13.

By registering in the Application and entering into the contract with the Company, you acknowledge that you have reached the age of 13 (or the equivalent minimum age in your home country) and under the laws of your country of residence you have all rights to provide us with your personal data for processing. If the minimum age in your home country is older, your parents (or a guardian) shall provide us with their consent to collect and process your personal data and register an Account in the Application. In such case please do not register an Account if your parent (or guardian) has not provided the appropriate consent to it. If you are a parent or guardian, you can provide us with your consent to register an Account for you child via the following email address: aimedvediev@gmail.com.

If you have any reason to believe that a child under the age of 13 (or the equivalent minimum age in such a child's home country) has provided his/her personal data to us, please contact us at aimedvediev@gmail.com. If we receive a confirmation that we have obtained the personal data of a child below the appropriate age of consent in such child's home country without consent of his/her parents (or a guardian), we will delete the Account of such a child in the Application and all personal data that we have obtained related to him/her.

Data Security, Integrity and Retention

We will store and process your personal data for as long as needed to provide you or other customers with the services.

Also, you may request erasing of your personal data by contacting us in any way convenient for you.

We store and process your personal data until we do not need it for any of the purposes defined in this Policy unless longer storage is required or expressly permitted by law.

In any case we store personal data we obtained from you, as described under the 'Use of Your Personal Data' section, for a specified period, as described below:

- We store the information you provided us with when you registered on the Platform (including information obtained from identification token), as well as the information you added to your Account for the entire period when you access or use our services and for 0 days since the deletion of your account from the Application.

- We store automated collected data obtained via cookies and similar technologies for a year;
- We store the personal data obtained through communication with you regarding our services via means of communication available on the Platform for a year.

We may not delete or anonymise your data if we are compelled to keep it under the under article 30 of the GDPR and other applicable laws.

Notwithstanding any of the aforementioned periods of data storage, you may request to delete your personal data by sending us an email at aimedvediev@gmail.com or contacting us via another way convenient for you.

We have implemented appropriate organisational, technical, administrative, and physical security measures that are designed to protect your personal data from unauthorised access, disclosure, use, and modification. We regularly review our security procedures and policies to consider appropriate new technology and methods.

Data Sharing and Disclosure

We only transfer your personal data to third parties according to the requirements of GDPR.

Where possible, we always enter into data processing agreements (DPAs) and Non-Disclosure Agreements (NDAs) with our third parties.

We may disclose the personal data to third parties, including those located outside the EU and EEA, provided that proper safeguards are put in place and the applicable local laws do not put your rights at risk.

We may share your personal data as a data controller to data processors in accordance with provisions specified hereafter.

Sharing personal data with data processors

There are many features necessary to provide you with our services that we cannot complete ourselves, thus we seek help from third parties. We may grant some service providers access to your personal data, in whole or in part, to provide the necessary services.

Therefore, we may share and disclose your personal data to other data processors:

- Google Cloud Platform (Firebase), USA: to provide secure transfer and storage of personal data on the servers. You may familiarise yourself with its privacy policy [here](#);
- Revenue Cat, USA: is an in-app subscription platform that makes it easy to build and manage app subscriptions. You may familiarise yourself with its privacy policy [here](#);

During our business activities we may engage different specialists which may receive your personal data, including technical, sales and marketing specialists, to provide you with better customer service. Also, we may disclose some of your personal data to our outsource legal professionals to make our business accurate and transparent. The abovementioned specialists are collectively referred to as Contractors.

We may transfer your personal data to countries outside the EU and EEA (the USA and Ukraine) that are not determined to offer an adequate level of data protection on the basis of article 45 of GDPR (adequacy decision) with appropriate safeguards as determined under the GDPR.

We only transfer your personal data to third parties within requirements under the GDPR. Where possible, we always enter into Data Processing

Agreements (DPAs) and Non-Disclosure Agreements (NDAs) with them and treat personal data transfer seriously.

Transferring your personal data outside of the European Economic Area

We may transfer your personal data to third countries outside the EU and the EEA under Article 46 of the GDPR on the appropriate safeguards, including the standard contractual clauses (SCC).

For transfers to countries that do not fall under requirements of Article 45 of the GDPR on the adequacy of the level of protection, we may transfer your personal data to the third countries outside the EU and the EEA under Article 46 of the GDPR with the appropriate safeguards, including the standard contractual clauses (SCC).

We disclose your personal data to the countries outside the EU and the EEA, in compliance with the standard contractual clauses (SCC) approved by the European Commission in order to adduce adequate safeguards with respect to the protection of privacy and fundamental rights and freedoms of natural and legal persons. We put supplementary measures in place when transferring data outside the EU and the EEA, where appropriate, for example, such as conducting transfer impact assessments (TIA) when necessary.

Your Rights under the GDPR

You may exercise the following rights under the General Data Protection Act (GDPR):

- right of access;
- right to rectification;
- right to erasure;
- right to restriction of processing;
- right to object to processing;
- right to data portability;
- right to lodge a complaint;
- right to consent withdrawal.

You may exercise the following rights by submitting your request at aimedvediev@gmail.com.

When we act as a joint controller with regard to particular processing of personal data, you may exercise your rights under the GDPR in respect of and against both advertising platform and us.

Rights under the GDPR:

- right of access means that you may ask us to send you the copy of your personal data collected together with information regarding the nature, processing and disclosure of that personal data;
- right to rectification means that you may ask us to update and correct the false data, missing or incomplete personal data.
- right to erasure (to be “forgotten”) means that you may ask us to delete your personal data collected, except insofar it is prohibited by appropriate laws.
- right to restriction of processing means that you may ask us to restrict processing where:
 1. your personal data is not correct or outdated;
 2. the processing is unlawful.
- right to object to the processing means that you may raise objections on grounds relating to your particular situation;
- right to data portability means that you may ask us to transfer a copy of your personal data to another organisation or to you;
- right to withdraw the consent when your personal data processed on a basis of your consent;

- right to lodge a complaint with the supervisory data protection authority pertaining to the processing of your personal data.

You have the right to submit the complaint to the supervisory authority of your place of residence within the EU or to the data protection authority.

Please, note that we may need to confirm your identity to process your requests to exercise your rights under the GDPR. Thus, we may not be able to satisfy your request, if you do not provide us with sufficient detail to allow us to verify your identity and respond to your request.

Data Protection Authority

We kindly ask you to contact us directly so that we can quickly answer your question.

We kindly invite you to share your concerns with us in the first place regarding any issue related to your personal data processing. You may use the following channels to address your inquiries: aimedvediev@gmail.com.

In some cases, you have the right to lodge a complaint about our use of your personal data with a data protection authority. For more information, please contact your national data protection authority. We will cooperate with the appropriate governmental authorities to resolve any privacy-related complaints that cannot be amicably resolved between you and us.

Changes to the Privacy Policy

We may change this policy from time to time due to the different purposes.

We will notify you on such material changes through means available to us.

This Policy may be changed from time to time due to the implementation of new updates, technologies, laws' requirements or for other purposes. We will send notice to you if these changes are dramatic and where required by applicable laws, we will obtain your consent for the subsequent processing. In any case, we encourage you to regularly review this Policy to check for any changes.

Such notification may be provided via your email address, announcement published on the Platform and/or by other means, consistent with applicable law.

How to Contact Us

Please contact us if you have any questions about our processing activities, this Privacy Policy, or your rights.

If you have a question related to this Privacy Policy, our processing activities, or your data subject rights under GDPR and other applicable laws, you can contact us directly using the following details:

- Our email: aimedvediev@gmail.com
- Phone number: +48514264293
- Telegram: <https://t.me/medai>
- WhatsApp: +48514264293