

# PRIVACY POLICY

Effective date: 13 December, 2022

Welcome to Blackbelt Labs OÜ (“**Company**,” “**we**,” “**us**” or “**our**”), a mobile technology company specializing in deep learning-related products. Our goal is to move forward mobile photography and video creation to the next level using neural networks, deep learning and computer vision technics. We aim to create new ways for people to express their emotions through the camera.

This Privacy Policy (this “**Privacy Policy**”) describes:

- The types of information we may collect or that all users or others (“**Users**”, “**you**” or “**your**”, **as applicable**) may provide while downloading, installing, registering with, accessing, or otherwise using (“**Use**”) our mobile application Discotalk: AI creative app (“**Discotalk**” or “**application**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies only to information we collect in Discotalk and via email, text, and other electronic communications sent through or in connection with Discotalk.

We undertake to build Discotalk and any of its features in such a way that it respects your privacy and are committed to protecting it through our compliance with this Privacy Policy. This Privacy Policy not only allows you to understand what we do with your Personal Data (as defined below), but also to manage your Personal Data effectively.

**Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. The purpose of our Privacy Policy is to explain what data we collect, how it is used and shared, and how you can control it. If you do not want us to process your Personal Data as it is described in this Privacy Policy, please do not Use Discotalk.**

By Using Discotalk you understand and agree that we are providing you with tools for editing and adjusting photos and videos that you can upload onto it. If you have any questions about this Privacy Policy or Discotalk, please contact us at [privacy@Discotalk-ai.com](mailto:privacy@Discotalk-ai.com) (for additional contact information, [please, see Section 13 of this Privacy Policy “How to Contact Us”](#)).

This Privacy Policy **DOES NOT** apply to the information that:

- We collect offline or on any other our apps (e.g., Prisma) or websites, including websites you may access through Discotalk.
- You provide to or that is collected by any third party (e.g., any third-party application or website, even if the link to it is accessible through Discotalk).

## 1. INFORMATION WE COLLECT AND HOW WE COLLECT IT

We may collect several types of information, including but not limited to Personal Data, from and about you:

- Directly from you when you provide it to us.
- Automatically when you Use Discotalk. Information collected automatically may include Usage details and internet protocol (“IP”) addresses.
- From third parties, for example, our Service Providers (as defined below).

To the extent information is: (i) associated with an identified or identifiable natural person and (ii) protected as personal data under applicable data protection laws, such information is referred to in this Privacy Policy as “**Personal Data**”.

## 2. INFORMATION YOU PROVIDE TO US DIRECTLY

When you Use Discotalk, you usually provide to us certain information, including your Personal Data:

- **Photos and videos** that you provide when you Use Discotalk, via your camera or camera roll, if you have granted us permission to access your camera or camera roll. You provide such a permission through the request that appears on your mobile device (it may differ depending on your device operating system). You may revoke permission to access your camera or camera roll through the settings on your mobile device, and here’s how to do it.  
If you use iOS device:
  1. On your iPhone or iPad open Settings app.
  2. Scroll down and tap “Privacy”.
  3. Tap “Camera” or “Camera roll”.
  4. Next to Discotalk, toggle the permissions switch on or off.
- If you use Android device:
  1. On your device open Settings app.
  2. Tap “Apps”.
  3. Tap “Discotalk”. If you can’t find it, tap “See all apps”. Then, choose Discotalk.
  4. Tap “Permissions”.
  5. To change a permission setting, tap it, then choose “Allow” or “Don’t allow”.
- Please note that we always delete all metadata that may be associated with your photos and videos by default (including, for example, geotags) before storing your photos or videos to our systems.
- **Information about your gender.** When you use our AI Avatars feature, we ask you about your gender. This information is used by the AI algorithm to generate the avatar that will be in accordance with your gender: for example, if you choose to identify your gender as a woman (she / her), then you will receive more feminine-like avatars.
- **Information that you provide by interacting with Discotalk.** This includes information provided at the time of Using Discotalk, purchasing certain enhanced features of Discotalk, requesting further services through Discotalk and filling in forms in Discotalk. We may also

ask you for additional information about your user ID, your use of Discotalk and your technical issues when you report a problem with Discotalk.

- **Details of your in-app subscriptions in Discotalk.**
- If you contact us, **records, copies of your correspondence with us and contact details that you have provided us while making your inquiries** (such as your name, postal addresses, email addresses and phone numbers or any other identifier by which you may be contacted online or offline), in order to investigate your concerns, respond to your inquiries and to monitor and improve our responses to your and other Users inquiries in relation to Discotalk.

### 3. INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

When you Use Discotalk, we use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- **Usage details.** Details of your Use of Discotalk, including traffic data, logs and other communication data and resources you use through Discotalk.
- **Device information.** Information about your mobile device and internet connection, including your IP address, the device's unique device identifier, operating system, and mobile network information,
- Upon your consent, we use technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). If you do not want us to collect this information, you can opt-out of the tracking in your settings (for iOS) or by contacting us at [privacy@Discotalk-ai.com](mailto:privacy@Discotalk-ai.com).  
If you use iOS device:

1. Go to Privacy settings to see a list of apps that requested to track your activity. On iPhone or iPad, go to Settings > Privacy > Tracking.
2. Tap to turn off or turn on permission to track for Discotalk.

The information we collect automatically under this Privacy Policy may include your Personal Data. It helps us to improve Discotalk and to deliver better service, including but not limited to enabling us to estimate our audience size and Usage patterns and recognize when you Use Discotalk.

We have a process in place to anonymize data specified in this Section 3 fully by erasing identifiers that connect you to stored data. We use this anonymized data for analytical and other business purposes.

**The technologies we use for automatic data collection may include:**

**Third-party analytics.** We use third-party analytics tools, such as Google Firebase, Facebook Analytics, AppsFlyer and Amplitude, to help us measure traffic and usage trends for Discotalk. These tools collect information sent by your device or Discotalk, which includes your pseudonymised user ID and the information about Discotalk web pages you visit when following the links available to you on Discotalk, your actions in Discotalk application and basic information about the type of

subscription you have. We collect and use this analytics information in an aggregated manner with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User. For information on how third party analytics tools collect and process your data and to opt out of such collection and processing, generated by your Use of Discotalk, please visit [the following link](#) or contact us at [privacy@Discotalk-ai.com](mailto:privacy@Discotalk-ai.com).

**Log file information.** Log file information is automatically reported to Discotalk each time you Use Discotalk. When you Use Discotalk, we and our Service Providers may automatically record certain log file information, including your IP address,, referring/exit pages and URLs, number of clicks and how you interact with links on and through Discotalk, domain names, landing pages, pages viewed, and other such information. The information allows us to receive more accurate reporting and improve Discotalk.

**Device identifiers.**When you use a mobile device like a tablet or phone to Use Discotalk, we access, collect, monitor, store on your device, and/or remotely store one or more “**device identifiers**”. Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may identify data stored in connection with the device hardware, operating system or other software, or data sent to the device by us. A device identifier may deliver information to us or to our Service Providers about how you Use Discotalk and may help us and others (on our request) produce a report on such Use. Among others we collect the following device identifiers:

- User device ID. Platform (iOS/Android). Device OS version.
- App version.
- First request time. Language.
- Region/CountryTimezone.
- Model.
- Push token (optional).

**Registered Users.** If you are a registered User, we collect more Personal Data about you including the following:

- Email.
- User device ID (generated by our application). First User authorization date and time.
- Google Play store account information (UserID, nickname, profile image), if you choose to log in via your Google Play account.
- Apple App store account information (Apple ID, profile image), if you choose to log in via sign in with Apple.

## 4. HOW WE PROCESS YOUR PHOTOS AND VIDEOS

For Use of Discotalk you may provide us and upload to Discotalk your face images (photo or video). In order to make possible for you to Use certain functions of Discotalk, we will process (provided by you) human face images (photo or video) through TrueDepth API technologies that will provide us information about such human faces' position, orientation and their topology on your image and/or video frame. We do not have access the your original photos that you upload, such photos are stored on your device only. What we see is only the anonymized information, as described above,

about the technical characteristics of the photo (faces' position, orientation, their topology on your image and/or video frame). For more information about TrueDepth API processing of your photos and videos you may visit [the following link](#). None of the information collected by the TrueDepth API ever leaves the user's device nor is it persistently stored on the device.

Images (photo or video), that you provide us in or through Discotalk, and/or other information related to human faces obtained from your images (photo or video) and/or using TrueDepth API technologies, such as ARKit, are the **"Face Data"**. The Face Data shall be considered the Personal Data

We collect and store your Face Data for online processing function. We also share and transfer the Face Data off the User devices to our cloud providers (Google Cloud Platform and Amazon Web Services) for the same purpose in which case, the photos: (i) become available to us in an anonymised manner (we get information about your pose, orientation and the topology on your image and/or video frame) and (ii) are automatically deleted within 24 hours after being processed by Discotalk. In case of using AI Avatars feature, the photos are automatically deleted after the AI results are generated.

We do not use your Face Data you provide when you Use Discotalk for any reason other than to apply different stylized filters or effects to them unless you have given us your explicit consent to use the photos or videos for a different purpose.

Notwithstanding anything to the contrary in other Sections of this Privacy Policy in relation to the Personal Data, we do not:

- Use the Face Data to identify any individual User.
- Use the Face Data for authentication, advertising, or marketing purposes, or to otherwise target a User in a similar manner.
- Use the Face Data to build a User profile, or otherwise attempt, facilitate, or encourage third parties to identify anonymous Users or reconstruct User profiles based on the Face Data.
- Transfer, share, sell, or otherwise provide the Face Data to advertising platforms, analytics providers, data brokers, information resellers or other such parties. In order to make it possible for you to Use AI Avatars function of Discotalk, we will process human face images / photos (provided by you) through [Stable Diffusion AI technology](#). However, your uploaded photos are deleted immediately after you receiving the result in the AI Avatars feature.

## 5. HOW WE USE COLLECTED INFORMATION

**Your photos and videos.** We do not use photos or videos you provide when you Use Discotalk for any reason other than to apply different stylized filters or effects to them, unless you have given us your explicit consent to use the photos or videos for a different purpose. Please note that to apply different stylized filters or effects to your photos we may upload such photos to the cloud providers we use (Google Cloud Platform and Amazon Web Services), in which case, the photos: (i) become available to us anonymously and (ii) are automatically deleted within 24 hours after being processed by Discotalk.

**Other information.** We may use your information other than photos and videos for the following purposes:

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us in relation to Discotalk. We process your personal data as part of our contractual obligation.
- To provide you with support and to respond to your inquiries. If you share your Personal Data (including your name and contact information) to ask a question about Discotalk, we will use that Personal Data to investigate your concerns, respond to your inquiries and to monitor and improve our responses to your and other Users inquiries in relation to Discotalk. It is our legitimate interest to provide you with high-quality support.
- To notify you about changes to Discotalk or any products or services we offer or provide through Discotalk, including by sending you technical notices, notices about your account/subscription, including expiration and renewal notices, updates, security alerts and support and administrative messages, which we may send through an in-app or a push notification (you may opt-out of push notifications by changing the settings on your mobile device). It is our legitimate interest to keep you updated on your use of Discotalk.
- To diagnose or fix technology problems in relation to Discotalk. It is our legitimate interest to maintain high security standards and good quality of the application.
- To present to you and others with Discotalk and its contents and any other information, products or services that you request from us. We do so to provide you with the services, since its our contractual obligation to you.
- To automatically update Discotalk on your device. We do so to provide you with up-to-date version of our application, which is our legitimate interest.
- To monitor metrics such as total number of Users, traffic, and demographic patterns (including via Service Providers as specified in Section 7). It is our legitimate interest to make analytics of our audience as it helps us understand our business metrics and improve our product.
- To provide, improve, test, and monitor the effectiveness of Discotalk. It is our legitimate interest to make analytics of our audience as it helps us understand our business metrics.
- To train our neural network algorithms. We use your photos and videos to train our algorithms to perform better and show you better results. We have a legitimate interest to do so, and we do our best to minimise the data that we receive and not to override the rights and freedoms of the users in this regard.
- To provide personalized content and information to you and others in relation to Discotalk, which could include online ads or other forms of marketing (including via email). We do so upon your explicit consent.
- In any other way, we may describe in this Privacy Policy.

We will not process your Personal Data in a way that is incompatible with the purposes for which it has been collected or authorized by you in accordance with this Section 5 or collect any Personal Data that is not required for the mentioned purposes (“**purpose limitation principle**”).

For any new purpose of processing we will ask for your separate explicit consent. To the extent necessary for those purposes, we take all reasonable steps to ensure that your Personal Data is reliable for its intended use, accurate, complete and current. We also undertake to collect only such amount and types of your Personal Data that are strictly required for the purposes mentioned in this Section 5 (“**data minimization principle**”).

## 6. YOUR RIGHTS

**Access, modification, correction and erasure.** You can send us an email at [privacy@discotalk.ai](mailto:privacy@discotalk.ai) to request access to, modification, correction, update, erasure or deletion of any Personal Data that you have provided to us and that we have about you. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

**EEA/UK residents.** Individuals residing in the European Economic Area (“EEA”) and the United Kingdom (“UK”) have certain statutory rights in relation to their Personal Data including under the General Data Protection Regulation (Regulation (EU) 2016/679) (“EEA GDPR”) and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020 (SI 2020/1586), as may be amended from time to time (“UK GDPR”) (collectively, the “GDPR”), including the rights specified below. You can exercise these rights by contacting us (for contact information, please, see How to Contact Us Section).

- **Access to your Personal Data and data portability.** You have a right to request information about whether we have any Personal Data about you, to access your Personal Data (including in a structured and portable form) that you have provided to us, when Using Discotalk and that we have about you. You can do this by contacting us.
- **Rectification of your Personal Data and restriction of processing.** You are responsible for ensuring the accuracy of your Personal Data that you provide to us. Inaccurate information may affect your experience when Using Discotalk features and our ability to contact you as described in this Privacy Policy. If you believe that your Personal Data is inaccurate, you have a right to contact us and ask us to correct such Personal Data. You also have the right to demand restriction of processing of your Personal Data, if you contest the accuracy of the Personal Data which inaccuracy is verified by us.
- **Erasure of your Personal Data.** If you believe that your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or in cases where you have withdrawn your consent or object to the processing of your Personal Data, or where the processing of your Personal Data does not otherwise comply with the GDPR, you have the right to contact us and ask us to erase such Personal Data. Please be aware that erasing some Personal Data may affect your ability to Use Discotalk.
- **Right to object processing or otherwise using your Personal Data.** You can object to and stop us from processing or otherwise using your Personal Data by contacting us. Please be aware that our inability to process or otherwise use some of your Personal Data may affect your ability to Use Discotalk.
- **Notification requirements.** We commit to notify you promptly and your data protection authority within the timeframe specified in applicable law (not later than 72 hours from the moment we are aware of the data breach) about any Personal Data breaches in relation to you.
- **Notice about automated decision-making.** We use automated decision-making tools (e.g. neural networks) that process your photos and videos in order to provide you better services through Discotalk.
- **Data Protection Authorities.** Subject to the GDPR, you have the right to lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with the GDPR.



Please keep in mind that in case of a vague access, erasure, objection request or any other request in exercise of the mentioned rights we may engage you in a dialogue to better understand the motivation for the request and to locate responsive information. In case this is impossible, we reserve the right to refuse granting your request.

Following the provisions of the GDPR, we might also ask you to prove your identity (for example, by requesting your user or some other proof of your identity) in order for you to invoke the mentioned rights. This is made to ensure that no right of third parties are violated by your request, and the mentioned rights are exercised by an actual Personal Data subject or an authorized person.

Please note that we will process your request within 30 days after receiving it, but it may take up to 90 days in some cases, for example for full erasure of your Personal Data stored in our backup systems - this is due to the size and complexity of the systems we use to store data.

### **Opting Out of Promotional Emails**

IF REQUIRED BY LAW, WE WILL ASK FOR YOUR CONSENT TO SEND YOU PROMOTIONAL AND MARKETING EMAILS. IF YOU WISH TO OPT OUT OF OUR PROMOTIONAL AND MARKETING EMAILS, YOU CAN OPT OUT FROM OUR PROMOTIONAL AND MARKETING EMAIL LIST BY USING ANY OF THE FOLLOWING METHODS:

- by following the opt-out links in any marketing email sent to you; or
- through Discotalk settings on your mobile device; or
- by contacting us at any time using the contact details in How to Contact Us Section.

**Bases for Using Your Personal Data.** If you reside in the EEA or the UK we are only allowed to use your Personal Data when certain conditions apply. These conditions are called "legal bases", and we typically rely on one of four:

- **Contract.** One reason we might use your Personal Data is because you formed a contract with us by accepting the Discotalk's [Terms of Use](#), and use of your Personal Data is necessary for the performance of the contract. For example, to enable you to access and use Discotalk or send you information that you have requested. The data we process under this legal basis includes, among others, your credentials or your photos and videos
- **Legitimate interest.** Another reason we might use your information is because we have a legitimate interest in doing so. For example, we need to use your Personal Data to operate, protect, improve and optimize Discotalk and your User experience, for example, by conducting research. The data we use includes, among others, the information about your use of our website or of Discotalk applications (for example, the features you interact most with).
- **Consent.** In some cases we will ask for consent to use your Personal Data for specific purposes. If we do, we will make sure you can revoke your consent in Discotalk settings or by contacting us. For example, you may give us your consent to send you marketing materials, and for this purpose we will process your name and email address. If you wish to revoke your consent, please contact us at [privacy@discotalk.ai](mailto:privacy@discotalk.ai).
- **Legal obligation.** We may be required to use your Personal Data to comply with the law, for example, when we need to take action to protect our Users.



**Your California Privacy Rights.** If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Data. To learn more about your California privacy rights, visit (i) [the following link](#) and (ii) our [CCPA Privacy Notice for California Residents](#).

## 7. SHARING OF COLLECTED INFORMATION

We may disclose aggregated information about our Users and information that does not identify any individual without any restriction. We may remove parts of data that can identify you and share anonymized data with any persons.

We do not rent or sell your Personal Data, including photos and videos, to any third parties outside the Company or its Affiliates (as defined below).

**Parties with whom we may share your Personal Data.** We do not share or transfer your photos or videos to third parties (except uploading the photos to our cloud providers Google Cloud Platform and Amazon Web Services to provide online processing function, and storing and deleting such photos as described in this Privacy Policy). We use only secure places of storage, such as Google Cloud Platform and Amazon Web Services. Google LLC and Amazon Web Services, Inc. are located in the United States of America. To learn about data protection practices of Google LLC please visit the following link. To learn about data protection practices of Amazon Web Services, Inc. please visit the following link.

We may share your Personal Data as well as other collected information (including but not limited to, information from cookies, log files, device identifiers and Usage data) with businesses that are legally part of the same group of companies that we are part of, including our subsidiaries, or that become part of that group (“**Affiliates**”). Affiliates may use this information to help provide, understand, and improve Discotalk (including by providing analytics). Such Affiliates are bound by the rules of this Privacy Policy.

We also may share your Personal Data and other collected information with third-party organizations such as contractors and service providers that we use to support our business and who are bound by confidentiality and data protection terms (consistent with this Privacy Policy) to keep your Personal Data confidential and use it only for the purposes for which we disclose it to them (and as directed and authorised by us) (“**Service Providers**”).

Such Service Providers include (i) cloud providers Google Cloud Platform and Amazon Web Services, that we use to apply photo editing features of Discotalk to your photos and to store and delete such photos, as described in this Privacy Policy, (ii) third parties that may use your photos collected by us in the ways described in this Privacy Policy and where legally required with your explicit consent, (iii) third-party analytics, as specified in this Privacy Policy, (iv) email delivery services and (v) professional advisors, such as lawyers, auditors and insurers, in the course of the professional services that they render to us.

We may also share certain Personal Data as well as other Collected Information with third-party advertising partners. These third-party advertising partners may use tracking technologies and other automatic information collection technologies to collect information about you or your device when you Use Discotalk. The information they collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across

different websites, apps, and other online services websites. Such information would allow third-party ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information on how third-party advertising partners collect and process your data and to opt out of such collection and processing, generated by your Use of Discotalk, please visit [the following link](#).

**Meta API Conversions.** We also utilize Meta API service called "[API Conversions](#)" which creates a connection between our marketing data and Meta systems. Meta API Conversions, among other things, help us in optimizing ad targeting. According to these purposes, we send your hashed email addresses to Meta API Conversions service.

**What happens in the event of a change of control.** If we sell or otherwise transfer part or the whole of the Company or our assets to another organization (e.g., in the course of a transaction like a merger, divestiture, restructuring, reorganization, acquisition, bankruptcy, dissolution, liquidation), your Personal Data and any other collected information may be among the items sold or transferred. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

**Responding to legal requests and preventing harm.** We may access, preserve and share your information in response to a legal (like a search warrant, court order or subpoena), government or regulatory request if we have a good faith belief that the law requires us to do so. This may include responding to legal, government or regulatory requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects Users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve and share information when we have a good faith belief it is necessary to: (i) detect, prevent and address fraud and other illegal activity; (ii) protect ourselves, you and others, including as part of investigations; and (iii) prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

## 8. DATA SECURITY

We use reasonable and appropriate information security safeguards to help keep the collected information secure and to secure it from accidental loss and unauthorized access, use, alteration and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your collected information, we cannot guarantee the security of the collected information transmitted to or through Discotalk or an absolute guarantee that such information may not be accessed, disclosed, altered, or destroyed. Any transmission of your collected information is at your own risk. We are not responsible for circumvention of security measures contained in Discotalk. Please understand that there is no ideal technology or measure to maintain 100% security. Among others, we utilize the following information security measures:

- Pseudonymization of certain categories of your Personal Data.
- Encryption of your Personal Data in transit and in rest.
- All collected information is stored on our secure servers behind firewalls.

- Organizational and legal measures. For example, our employees and employees of our subsidiaries have different levels of access to your Personal Data and only those in charge of data management get access to your Personal Data and only for limited purposes required for the operation of Discotalk. We impose strict liability on such employees for any disclosures, unauthorized accesses, alterations, destructions and misuses of your Personal Data.
- Conducting periodical data protection impact assessments in order to ensure that the Company fully adheres to the principles of "privacy by design", "privacy by default" and others. We also commit to undertake privacy audit in case of the Company's merger or takeover.

The safety and security of your information also depends on you. Your privacy settings may also be affected by changes the social media services, through which you may share your photos and videos. We are not responsible for the functionality, privacy, or security measures of any other organization.

**Security breaches.** If we learn of a security systems breach, we may either post a notice, or attempt to notify you by email and will take reasonable steps to remedy the breach as specified in applicable law and this Privacy Policy. If we learn of a potential Personal Data breach, together with other actions referred to in the Privacy Policy (such as notifying you in certain cases), we will also undertake particular actions to remedy the breach as appropriate under the circumstances, which may include, logging you out from all the devices, resetting a password (sending a temporary password for you to apply) and performing other reasonably necessary activities and actions.

If you want to report a security incident related to Discotalk, please contact us at [privacy@discotalk.ai](mailto:privacy@discotalk.ai).

**Contacting us.** You can provide your feedback or report a technical issue by using "Send Feedback" button in Discotalk settings. The email will be sent from your personal email to [support@discotalk.ai](mailto:support@discotalk.ai), and the message will contain the following diagnostics information that will help us to resolve your issue/address your request:

- Phone model.
- Device OS version.
- Platform (iOS/Android).
- App version.
- User device ID.
- Language.
- Remaining space.

This information is used to assess your feedback and/or identify the problem if you are reporting one and is NOT USED to identify Users individually.

**Contacting you.** By Using Discotalk you consent to receive electronic communications from us (e.g., by posting in-app notices in Discotalk, push notifications or emails). These communications may include notices about Discotalk or its in-app subscriptions: e.g., changes/updates to features of Discotalk and their scope, prices of in-app subscriptions, technical and security notices, updates to this Privacy Policy and Discotalk terms of use.

## 9. DATA RETENTION

We retain your Personal Data for as long as we need it for the purposes for which it was obtained or until you ask us to delete it.

Normally, the retention term would be the term of your account existence. It means that we will normally retain your Personal Data until you delete your account or request us to delete your data (by contacting us at [privacy@Discotalk-ai.com](mailto:privacy@Discotalk-ai.com)). **Please note that deletion of Discotalk application does not mean deletion of your account!**

As to your photos and videos, these are deleted from our systems within 24 hours from their upload. We also may retain your Personal data in connection with your privacy-related requests and communications with us, if any, as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your Personal Data, we may continue to retain and use anonymised data previously collected that can no longer be used for personal identification.

## 10. CROSS-BORDER TRANSFERS

The Company is based in the United States. Accordingly, your Personal Data may be transferred to and stored in the United States or in other countries. If you are an EU / EEA / UK resident, please note that Discotalk transfers Personal Data from the EU, EEA and UK to the U.S. and other third countries. When transferring Personal Data of the users from the EU, EEA or the UK outside of the EU, EEA or the UK, we either implement standard contractual clauses or rely on current European Commission adequacy decisions.

As to the location of our servers, we use AWS servers located in the USA for Discotalk operation, while our analytics operations are processed both on the servers provided by AWS (located in the USA) and by Google LLC (located in the Republic of Ireland).

In appropriate cases, the Company will enter into standard contractual clauses as approved under the European Commission Decision C(2010)593 or decision 2004/915/EC, as applicable, to permit the transfer of your Personal Data to the United States, Cyprus or another country that has not been deemed to provide adequate level of data protection.

For further information please contact [privacy@discotalk.ai](mailto:privacy@discotalk.ai).

## 11. CHILDREN PRIVACY

**General age limitation.** Discotalk is not intended for or directed at children under 13, and we do not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to Use Discotalk. If you are under 13, do not: (i) Use or provide any information in Discotalk or through any of its features, or (ii) provide any information about yourself to us, including your name, address, telephone number or email address. In the event that we learn that we have collected or received any Personal Data from a child under 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe we might have any

information from or about a child under 13, please contact us (for contact information, please, see How to Contact Us Section).

**Age limitation for EEA residents.** Due to requirements of the GDPR, you shall be at least 16 years old in order to Use Discotalk. To the extent prohibited by applicable law, we do not allow Use of Discotalk by the EEA residents younger than 16 years old. If you are aware of anyone younger than 16 Using Discotalk, please contact us (for contact information, please, see How to Contact Us Section) and we will take required steps to delete information provided by such persons.

## 12. OTHER WEBSITES AND SERVICES

We are not responsible for the practices employed by any websites or services linked to or from Discotalk, including the information or content contained within them. Where we have a link to a website or service, linked to or from Discotalk, we encourage you to read the privacy policy stated on that website or service before providing information on or through it.

## 13. HOW TO CONTACT US. EEA/UK REPRESENTATIVE AND DATA PROTECTION OFFICER

**General contact details.** If you have any questions about this Privacy Policy or Discotalk, please contact us via email at [privacy@discotalk.ai](mailto:privacy@discotalk.ai) or our mailing address:

**Blackbelt Labs OÜ**

Narva mnt. 5

10110 Tallinn, Estonia

**Data protection officer.** If you are a resident of the EEA or the UK and you wish to exercise your rights under Section 6, or you have any questions about this Privacy Policy or Discotalk, you can contact our data protection officer via email at [privacy@Discotalk-ai.com](mailto:privacy@Discotalk-ai.com).

## 14. CHANGES TO OUR PRIVACY POLICY

The Company may modify or update this Privacy Policy from time to time. The date this Privacy Policy was last revised is indicated on the top of the page. In case the changes made include a new purpose of the processing, a legal basis, a new category of personal data to be collected or new data subject, other changes that can pose a risk to your rights and freedoms, Your continued Use of Discotalk after we made those changes is conditioned upon your consent given to those changes separately from this Policy. If you did not receive a request for your consent to the changes or refused to give a consent, those changes will not be applicable to you. That fact can negatively affect some of Discotalk services provided to you in case those services inevitably include consent to the changes.

