

Privacy Policy of Momentpin

1.0 Who are we?

Momentpin LTD

Room 1.01 Bellahouston Business Centre, 423 Paisley Road West, Glasgow, Scotland, G51 1PZ, United Kingdom

Owner contact email: compliance@momentpin.com

1.1 Momentpin Services

Welcome to Momentpin! We are a mobile phone and desktop application designed to bring the people together through the creation of moments within a trusted network. Our platform enables people all over the world to create communities and share content whilst maintaining their privacy. This platform enables adults to create child accounts to allow them to connect and develop their social network skills through the concept of a Social Sandpit™. MomentPin™ has been designed for users from birth to beyond, a trusted platform on which users can interact with confidence and trust.

1.2 Who's Who

When this Privacy Policy uses the term “Owner” we mean the person responsible for the content within an Organisation or Charity group. When we say “User”, “you” or “your” we mean anyone using our Services including organisations and third parties, all referred to collectively in these Terms.

Our Vision

MomentPin™ is committed to expanding the boundaries of social networks through innovation and change, by integrating family values into a social network so as to create safety, security and a real sense of belonging within our digital lives and beyond.

Executive Summary

MomentPin™ is planned to become the premier social network platform solving today's issues of user safety, privacy and control. It will enable adults to create child accounts to allow them to connect and develop their social network skills through the concept of a Social Sandpit™. MomentPin has been designed for users from birth to beyond, a trusted platform on which users can interact with confidence and trust. MomentPin has spent years maturing the concept and since June 2017 started building the technology. An improved version has been developed for both iOS, Android phones and desktop computers.

2.0 Personal Data That We Collect

Momentpin collects Personal Data from its Users. We respect our User's privacy and we are committed to protecting our User's personal data. This privacy policy will inform our Users as to how we look after their personal data and tells our Users about their privacy rights and how the law protects them.

This privacy policy aims to give information on how we collect and process personal data which you may provide to us through use of Momentpin (“the Application”).

It is important that you read this privacy policy together with any other privacy guidelines or procedures that we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other guidelines or procedures and is not intended to override them. Sometimes this will be on your own behalf and other times this will be on behalf of third parties using our third-party services to run the platform for i.e. for community groups which you are part of.

2.1 Information Collected from All Users

Information you provide to us: For all Users we collect Personal Data when you voluntarily sign up to the Service; first name; last name; phone number; company name; address; email address; city; field of activity; date of birth; Usage Data; website; Approximate location permission (non-continuous); Contacts permission; Microphone permission; Phone permission; SMS permission; Storage permission; Social media accounts permission; Camera permission;

Precise location permission (continuous); Photo Library permission; gender; Cookies; geographic position; Universally unique identifier (UUID); Crash information; device information; various types of Data; password; country; state; county; ZIP/Postal code; picture; profile picture; billing address; language; geography/region; number of Users ; number of sessions; session duration; Application opens; Application updates; first launches; operating systems; Data communicated while using the service; app information; device logs; screenshots.

All Data requested by this Application is mandatory, not providing this Data may make it impossible for this Application to provide its services. The application does not use Cookies, we do record your location via third-party services.

3.0 Mode and place of processing the Data

3.1 Methods of processing

The Owner 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. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

3.2 Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- Provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation to which the Owner is subject;
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- Processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

3.3 Place

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

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

3.4 Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

4.0 The purposes of processing

Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Content commenting, Device permissions for Personal Data access, Backup saving and management, Handling activity data, Hosting and backend infrastructure, Interaction with online survey platforms, Location-based interactions, Managing contacts and sending messages, Infrastructure monitoring, Social features, Registration and authentication provided directly by this Application, Analytics, Handling payments, Beta Testing, Displaying content from external platforms, Managing data collection and online surveys, Platform services and hosting and Data transfer outside the EU.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

5.0 Device permissions for Personal Data access

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

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, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

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 this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e. accessed to, modified or removed) by this Application.

5.1 Approximate location permission (non-continuous)

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services for permission to access the camera, contacts, microphone, phone features associated with telephony, photo library, precise location, SMS, social media accounts and storage.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the approximate position of the User on a continuous basis.

6.0 Detailed information on the processing of Personal Data and Third Parties

Table of Contents – Third Parties

Third Party Name	Purpose	Description	Personal Data Collected	Additional Information
<p>Google Analytics (Google LLC)</p> <p>Google Analytics for Firebase (Google LLC)</p>	Analytics	<p>Google Analytics is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.</p> <p>Google may use the Data collected to contextualize and personalize the ads of its own advertising network.</p> <p>Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner. Users may opt-out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase related sections of this privacy policy, if available.</p> <p>This Application uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.</p>	<p>Cookies; Usage Data; Application opens; Application updates; device information; first launches; geography/region; number of sessions; number of Users; operating systems; session duration.</p> <p>Category of personal data collected according to CCPA: internet information; geolocation data</p>	<p>Place of Processing: US Google Analytics – Privacy Policy – Opt Out. Privacy Shield participant.</p> <p>This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.</p> <p>In order to understand Google's use of Data, consult Google's partner policy</p>
Amazon Glacier	Backup saving and management	<p>Amazon Glacier is a service to save and manage backups provided by Amazon Web Services Inc.</p> <p>This type of service allows the Owner to save and manage backups of this Application on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to this Application.</p>	<p>Various types of Data as specified in the privacy policy of the service.</p> <p>Category of personal data collected according to CCPA: internet information.</p>	Place of processing: US – Privacy Policy .
<p>Test Flight (Apple Inc)</p> <p>Google Play Beta Testing</p>	Beta Testing	<p>This type of service makes it possible to manage User access to this Application, or parts of it, for the purpose of testing a certain feature or the entire Application</p> <p>TestFlight is a beta testing service provided by Apple Inc.</p> <p>The service provider may automatically collect data related to crashes and statistics related to the User's use of this Application in a personally identifiable form.</p>	<p>App information; country; Data communicated while using the service; date of birth; device information; device logs; email address; first name; gender; last name; phone number; Usage Data.</p> <p>Data communicated while using the service; date of birth; device information; device logs; email address; first name; gender; last name;</p>	<p>Place of processing: US.</p> <p>Test Flight - Privacy Policy.</p> <p>Google Play Beta Testing - Privacy Policy.</p> <p>This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.</p>

(Google LLC)		Google Play Beta Testing is a beta testing service provided by Google LLC.	phone number; Usage Data. Category of personal data collected according to CCPA: identifiers; biometric information internet information.	
Google Maps Widget (Google LLC)	Displaying content from external platforms	This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it. Google Maps is a maps visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.	Cookies; Usage Data Category of personal data collected according to CCPA: internet information.	Place of processing: US – Privacy Policy . Privacy Shield participant. This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.
Stripe	Payment	Stripe is a payment service provided by Stripe Inc.	Various types of Data as specified in the privacy policy of the service Category of personal data collected according to CCPA: internet information.	Place of processing: US – Privacy Policy . Privacy Shield participant.
Survey Monkey Widget (Survey Monkey)	Hosting and backend infrastructure	This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Application. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. The SurveyMonkey Widget is a service for interacting with the SurveyMonkey online survey platform provided by SurveyMonkey Inc.	Cookies; Usage Data Category of personal data collected according to CCPA: internet information.	Place of processing: US – Privacy Policy . Privacy Shield participant. This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.
Mailgun Amazon Simple Email	Managing contacts and sending messages	This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User. These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message. Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc. Amazon Simple Email Service is an email address management and message	Email address; phone number; various types of Data as specified in the privacy policy of the service Category of personal data collected according to CCPA: identifiers; internet information	Place of processing: US. Mailgun - Privacy Policy . Privacy Shield participant. Amazon Simple Email Service (Amazon) - Privacy Policy . Privacy Shield participant. Twilio - Privacy Policy . Firebase Cloud Messaging - Privacy Policy ; Ireland – Privacy Policy . Privacy Shield participant.

<p>Service (Amazon)</p> <p>Twilio (Twilio, Inc)</p> <p>Firebase Cloud Messaging</p>		<p>sending service provided by Amazon.com Inc.</p> <p>Twilio is a phone numbers management and communication service provided by Twilio, Inc.</p> <p>Firebase Cloud Messaging is a message sending service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is accessed from. Firebase Cloud Messaging allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments.</p>		<p>This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.</p>
<p>Google Play Store (Google LLC)</p> <p>Apple App Store (Apple Inc)</p>	<p>Platform services and hosting</p>	<p>These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.</p> <p>Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.</p> <p>The Google Play Store (Google LLC) application is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google LLC.</p> <p>The Apple App Store application is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.</p>	<p>Usage Data.</p> <p>By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.</p> <p>Users may opt-out of these analytics feature directly through their device settings. More information on how to manage analysis settings can be found on this page</p> <p>By virtue of being distributed via this app store, Apple collects basic analytics and provides reporting features that enables the Owner to view usage analytics data and measure the performance of this Application. Much of this information is processed on an opt-in basis.</p> <p>Users may opt-out of these analytics feature directly through their device settings. More information on how to</p>	<p>Place of processing: US</p> <p>Google Play Store (Google LLC) – Privacy Policy. Privacy Shield participant.</p> <p>Apple App Store (Apple Inc)– Privacy Policy. Privacy Shield participant.</p>

			manage analysis settings can be found on this page	
			Category of personal data collected according to CCPA: identifiers; internet information	
SwiftAid	UK HMRC Charity scheme	UK Government allows UK charities to claim back tax on donations, boosting the value of your gift by 25p for every £1.	email address, home address and phone number	Place of processing: UK https://www.swiftaid.co.uk/legal/privacy/

Table of Contents – Definitions and legal references

Legal References	Definition
Personal Data (or Data)	Any information that directly, indirectly, or in connection with other information - including a personal identification number - allows for the identification or identifiability of a natural person.
Usage Data	Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.
User	The individual using this Application who, unless otherwise specified, coincides with the Data Subject.
Data Subject	The natural person to whom the Personal Data refers.
Data Processor (or Data Supervisor)	The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.
Data Controller (or Owner)	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.
This Application	The means by which the Personal Data of the User is collected and processed.
Service	The service provided by this Application as described in the relative terms (if available) and on this site/application.
European Union (or EU)	Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.
Cookies	Small piece of data stored in the User's device.

Personal Data is collected for the following purposes and using the above third-party services:

6.01 Contacting the User

Contact form (this Application)

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: address; city; company name; date of birth; email address; field of activity; first name; last name; phone number.

Category of personal data collected according to CCPA: identifiers; commercial information; internet information.

6.02 Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Application. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Comment system managed directly (this Application)

This Application has its own internal content comment system.

Personal Data collected: email address; first name; last name; Usage Data; website.

Category of personal data collected according to CCPA: identifiers; internet information.

6.1 Data transfer outside the EU

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

Other legal basis for Data transfer abroad (this Application)

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met. The transfer is necessary for:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent. In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Application.

Category of personal data collected according to CCPA: internet information.

Data transfer to countries that guarantee European standards (this Application)

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Personal Data collected: various types of Data.

Category of personal data collected according to CCPA: internet information.

Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield (this Application)

If this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the US is carried out according to the EU - U.S. and Swiss - U.S. Privacy Shield.

In particular, Personal Data is transferred to services that self-certify under the Privacy Shield framework and therefore guarantee an adequate level of protection of such transferred Data. All services are listed within the relevant section of this document and those that adhere to Privacy Shield can be singled out by checking their privacy policy and possibly also by specifically checking for Privacy Shield adherence in the official Privacy Shield List. Privacy Shield also specifically guarantees rights to Users which can be found in its most current form on the website run by the US Department of Commerce.

Personal Data may be transferred from within the EU or Switzerland to the U.S. to services that are not, or not anymore, part of Privacy Shield, only based on other valid legal grounds. Users can ask the Owner to learn about such legal grounds.

Personal Data collected: various types of Data.

Category of personal data collected according to CCPA: internet information.

7. Data transfer outside the EU

This Application requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (this Application)

This Application requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data collected: Approximate location permission (non-continuous); Camera permission; Contacts permission; Microphone permission; Phone permission; Photo Library permission; Precise location permission (continuous); SMS permission; Social media accounts permission; Storage permission.

Category of personal data collected according to CCPA: internet information; geolocation data.

9. Handling activity data

This type of service allows the Owner to use the activity data collected by your device in order for this Application to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings.

Depending on what is described below, third parties may be involved in the activity tracking.

Most devices allow for the User to control which Data is accessed or stored.

Activity data tracked by your device (this Application)

This Application uses some activity data tracked by your device to operate or to provide specific features.

Category of personal data collected according to CCPA: identifiers; biometric information.

10. Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general, and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

11. Hosting and backend infrastructure

This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Application.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

12. Location-based interactions

Non-continuous geolocation (this Application)

This Application may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application.

The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out its current location in the appropriate field and allows the application to detect the position automatically.

Personal Data collected: geographic position.

Category of personal data collected according to CCPA: geolocation data.

Geolocation (this Application)

This Application may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application.

Personal Data collected: geographic position.

Category of personal data collected according to CCPA: geolocation data.

13. Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

14. Managing data collection and online surveys

This type of service allows this Application to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

15. Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

15. Registration and authentication provided directly by this Application

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (this Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data collected: address; billing address; city; country; county; date of birth; email address; first name; gender; language; last name; password; phone number; picture; profile picture; state; various types of Data; ZIP/Postal code.

Category of personal data collected according to CCPA: identifiers; biometric information; internet information; sensorial information; inferred information.

16. Social features

Inviting and suggesting friends (this Application)

This Application may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data collected: various types of Data.

Category of personal data collected according to CCPA: internet information.

17. Access the address book

To use the features of Momentpin and communicate with others, you acknowledge and agree that you will provide Momentpin with your mobile number. You expressly acknowledge and agree that in order to provide the Service, Momentpin may periodically access your contact list and/or address book on your mobile device to find and keep track of mobile numbers of other users of the Service. We do not collect names, addresses or email addresses just mobile phone numbers. We will store all your details in our secure Third-Party Cloud Service and will hold your account and phone book details for the length of period your Momentpin account remains open. Should you delete your account, your details will be removed from our servers and databases.

18. Push notifications

This Application may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for this Application, some or all of the apps on the particular device.

Users must be aware that disabling push notifications may negatively affect the utility of this Application.

19. The Service is directed to children under the age of 13

a. Minimum age restriction - The minimum age of use for Momentpin is 16 years old. However, Parents or Guardian can create child accounts under 16-year-old, i.e. create accounts in addition to their own account and monitor their child's activities, posts and contacts.

b. This Application can be directed to children under the age of 13. It doesn't require the child to disclose any more information than is reasonably necessary to participate in its activity, in this instance the **parents** must **create** all accounts **under 16-year-old**. **Parents may review the personal information about their child collected by this Application - if any - outlined in the rest of this policy, ask for its deletion and request any further collection or use ,to be omitted by contacting the Owner. Parents may also agree to the collection and use of their child's information, but still not allow disclosure to third parties, unless disclosure is integral to the Service.**

20. Unique device identification

This Application may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

21. User identification via a universally unique identifier (UUID)

This Application may track Users by storing a so-called universally unique identifier (or short UUID) for analytics purposes or for storing Users' preferences. This identifier is generated upon installation of this Application, it persists between Application launches and updates, but it is lost when the User deletes the Application. A reinstall generates a new UUID.

22. Analysis and predictions based on the User's Data ("profiling")

The Owner may use the Personal and Usage Data collected through this Application to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more, about the profiling activities performed, Users can check the relevant sections of this document.

23. Unique device identification

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, object to processing of their Data, access their data, verify and seek rectification, restrict the processing of their Data, have their personal data deleted or otherwise removed, receive their Data and have it transferred to another controller and lodge a complaint.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

24. Video Streaming

A user can request to delete their files on the video streaming platform, should a user delete their momentpin account their streaming files will be deleted also, these streaming files are located on third-party host servers located outside the GDPR zone.

25. New Community Notifications

We will notify all users that new group are coming onboard to Momentpin platform, these are one off messages for information only. Users can choose to disable these notifications on the mobile application.

26. Momentpin Groups

If you join a community and the owner of that community requests information on the members of that community, providing they have a reasonable rationale for why they want this data and for how long they plan to retain this, then we will share the following data with them – email address, full name and phone number.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honour the “Do Not Track” requests, please read their respective privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

24. GiftAid

For UK Taxpayers - Our platform uses GiftAid functionality from a third party to interface to HMRC, their terms are located here <https://www.swiftaid.co.uk/legal/privacy/>

By donating through GiftAid your email address, home address and phone number will be visible to charities and / or community groups in their respective donor reports. Should you want to opt-out and not have your email address, home address and phone number visible then you must cease using our GiftAid service.

24. Charities, Organisations or Community Groups Email’s

Charities, Organisations or Community Groups might send email to donors from time to time, if you wish to opt-out you must cease using the Momentpin platform.

Information for Californian consumers

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users who are consumers residing in the state of California, United States of America, according to "The California Consumer Privacy Act of 2018" (Users are referred to below, simply as “you”, “your”, “yours”), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term “personal information” as it is defined in The California Consumer Privacy Act (CCPA).

Categories of personal information collected, disclosed or sold

In this section we summarize the categories of personal information that we've collected, disclosed or sold and the purposes thereof. You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.

Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, commercial information, biometric information, internet information, geolocation data, sensorial information and inferred information.

We will not collect additional categories of personal information without notifying you.

How we collect information: what are the sources of the personal information we collect?

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use this Application.

For example, you directly provide your personal information when you submit requests via any forms on this Application. You also provide personal information indirectly when you navigate this Application, as personal information about you is automatically observed and collected. Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

How we use the information we collect: sharing and disclosing of your personal information with third parties for a business purpose

We may disclose the personal information we collect about you to a third party for business purposes. In this case, we enter a written agreement with such third party that requires the recipient to both keep the personal information confidential and not use it for any purpose(s) other than those necessary for the performance of the agreement.

We may also disclose your personal information to third parties when you explicitly ask or authorize us to do so, in order to provide you with our Service.

To find out more about the purposes of processing, please refer to the relevant section of this document.

Sale of your personal information

For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to **another business or a third party, for monetary or other valuable consideration**”.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

Your right to opt out of the sale of personal information

You have the right to opt out of the sale of your personal information. This means that whenever you request us to stop selling your data, we will abide by your request.

Such requests can be made freely, at any time, without submitting any verifiable request, simply by following the instructions below.

Instructions to opt out of the sale of personal information

If you'd like to know more, or exercise your right to opt out in regard to all the sales carried out by this Application, both online and offline, you can contact us for further information using the contact details provided in this document.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of this Application and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We will not use your personal information for different, unrelated, or incompatible purposes without notifying you.

Your California privacy rights and how to exercise them

The right to know and to portability

You have the right to request that we disclose to you:

- the categories and sources of the personal information that we collect about you, the purposes for which we use your information and with whom such information is shared;
- in case of sale of personal information or disclosure for a business purpose, two separate lists where we disclose:
 - for sales, the personal information categories purchased by each category of recipient; and
 - for disclosures for a business purpose, the personal information categories obtained by each category of recipient.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

The right to request the deletion of your personal information

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Application, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and direct any of our service providers to do so.

How to exercise your rights

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfil your request.

Our disclosure(s) will cover the preceding 12-month period.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information - including a personal identification number - allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

Coppa

This document has a section dedicated to Californian consumers and their privacy rights.

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small piece of data stored in the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: September 9th, 2020

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