



Privacy Policy

(If you are a user having your usual residence in the EEA and Switzerland)

Last updated: June 2022

Welcome to Praaktis (the “**Platform**”). The **Platform** is provided and controlled by Praaktis Ltd. (“**Praaktis**”, “**we**” or “**us**”).

We are committed to protecting and respecting your privacy. This policy sets out the basis on which we process any personal data we collect from you, or that you provide to us. If you do not agree with this policy, you should not use the Platform.

If you have any questions about how we use your personal data, please contact support@praaktis.com.

Our representative in the European Union is Praaktis Limited, Warren Place, Birch Vale, Cobham, Surrey KT11 2PX.

SUMMARY

What information do we collect about you?

We collect and process information you give us when you create an account and upload content to the Platform. This includes technical and behavioural information about your use of the Platform. We also collect information about you if you download the app and interact with the Platform without creating an account.

How will we use the information about you?

We use your information to provide the Platform to you and to improve and administer it. Where it is in our legitimate interests, we use your information to, among other things,

improve and develop the Platform and ensure your safety. In each case where we have your consent, we will also use your personal information to serve you targeted advertising and promote the platform.

Who do we share your information with?

We share your data with third party service providers who help us to deliver the Platform including cloud storage providers. We also share your information with business partners, other companies in the same group as Praaktis Ltd, content moderation services, measurement providers, advertisers and analytics providers. Where required by law, we will share your information with law enforcement agencies or regulators and with third parties pursuant to a legally binding court order.

Your Rights

In certain circumstances, you have rights in relation to your information such as the right to deletion, the right to access and the right of portability.

How long do we keep hold of your information?

We retain your information for as long as it is necessary to provide you with the service so that we can fulfil our contractual obligations and rights in relation to the information involved. Where we do not need your information in order to provide the service to you, we retain it only as long as we have a legitimate business purpose in keeping such data or where we are subject to a legal obligation to retain the data. We will also retain your data if necessary for the establishment, exercise or defence of legal claims.

How will we notify you of any changes to this Privacy Policy?

We will generally notify all users of any material changes to this policy through a notice on our Platform. However, you should look at this policy regularly to check for any changes. We will also update the “Last Updated” date at the top of this policy, which reflects the effective date of such policy. By accessing or using the Platform, you acknowledge that you have read this policy and that you understand your rights in relation to your personal data and how we will collect, use and process it.

1. The types of personal data we use

We collect and use the following information about you:

Your Profile Information. You give us information when you register on the Platform, including your username, date of birth, email address and/or telephone number, information you disclose in your user profile and your photograph or profile video.

User Content and Behavioural Information. We process the content you generate on the Platform, including preferences you set (such as choice of language), videos you upload and comments you make (“User Content”). We collect information through surveys, challenges and competitions in which you participate. We also collect information regarding your use of the Platform, e.g. how you engage with the Platform, including how you interact with content we show to you, the ads you view and the users you invite as friends. We also infer your preferences, including your interests, gender and age for the purpose of personalising content. We process information about your friends, for the purposes of promoting your content to other users and exploring whether your profile presents further opportunities for collaboration. If you have consented, we will use this information for the purpose of serving personalised advertising. We will also process your personal data in order to tell you about services and opportunities.

Information from Third Parties. You may choose to share certain data with us from third parties or through your use of the Platform, we may collect such third party data automatically. We have set out further detail on the information we receive from third parties below:

Business Partners

If you choose to register to use the Platform using your social network account details (e.g. Facebook, Twitter, Instagram, Google), you will provide us or allow your social network to provide us with your username and public profile. We will likewise share certain information with the relevant social network such as your app ID, access token and the referring URL.

We use the information collected from you, and your interaction with the Platform and other third party sites, to infer your likely interests to provide you with more relevant advertising. This information tells us about websites you've visited, apps you've downloaded and purchases you have made so that we can predict what else might interest you in the future and assess how effective the advertising on our Platform is. We collect this information by the use of Cookies and similar technologies on our App and from similar information received from third parties who advertise on our Platform and whose sites you visit.

Technical Information we collect about you. We automatically collect certain information from you when you use the Platform including when you are using the App without an account. Such information includes your IP address, browsing history (i.e. the content you have viewed on the Platform), mobile carrier, time zone settings, identifier for advertising purposes and the version of the app you are using. We will also collect information regarding the device you are using to access the Platform such as the model of your device, the device system, network type, device ID, your screen resolution and operating system. Where you log-in from multiple devices, we will be able to use your profile information to identify your activity across devices.

Location. We use the 'Region' you select in Settings to customise your Praaktis experience. When you use the Platform on a mobile device, we will collect information about your location. In certain jurisdictions, with your permission, we will collect Global Positioning System (GPS) data and mobile device location information. If you do not wish to share your precise location with us, you can switch off location services via the settings on your mobile device.

Find other users and invite your friends. You can choose whether to find other users of the Platform using our 'Find Friends' function. This functionality allows you to see which of your friends from either your telephone's contact list or Facebook friends list is using the Platform and offers you the option to invite them to create a group of friends. You can also use this function to invite your contacts to join you on the Platform. We will use the contact information you have for that person, either from within your telephone's contact list or Facebook friends list and give you the option to send them either an SMS, email or third party message (such as Whatsapp, Facebook (including Facebook Messenger) or Twitter) inviting them to view your Praaktis profile.

2. Cookies

We use cookies and other similar technologies (e.g. pixels etc.) (“**Cookies**”) to enhance your experience using the Platform. Cookies are used to collect information, including personal data, from you. Cookies are small files which, when placed on your device, enable us to provide certain features and functionality.

3. How we use your personal data

We will use the information we collect about you in the following ways:

- In accordance with, and to perform our contract with you, we will use your information to:
 - notify you about changes to our service;
 - provide you with user support;
 - enforce our terms, conditions and policies;
 - administer the Platform including troubleshooting;
 - personalise the content you receive and provide you with tailored content that will be of interest to you;
 - enable you to interact with other users;
 - enable our messenger service to function if you choose to use this function; and
 - communicate with you.
- In order to comply with our legal obligations, we use your data to help us detect abuse, fraud and illegal activity on the Platform;

- In accordance with our legitimate interests to provide an effective and dynamic Platform, we will use your information to:
 - ensure your safety and security including reviewing user content, messages and associated metadata for breach of our Community Guidelines and other inappropriate content;
 - ensure content is presented in the most effective manner for you and your device;
 - improve, promote and develop the Platform and promote popular topics, hashtags and campaigns on the Platform;
 - carry out data analysis and test the Platform to ensure its stability and security;
 - allow you to participate in interactive features of the Platform;
 - to enable you to socialise on the Platform, for example, by allowing other users to identify you via the "Find other friends" function or through their phone contacts;
 - to ensure that you are old enough to use our Platform (as required by law).

- With your consent, we will use your information to:
 - provide you with personalised advertising; and
 - provide you with location-based services (where those services are available in your jurisdiction and you choose to share your precise location with us).

4. How we share your personal data

We share your data with the following selected third parties:

Business Partners

If you choose to register to use the Platform using your social network account details (e.g. Facebook, Twitter, Instagram, Google), you will provide us or allow your social network to provide us with your username and public profile. We will likewise share certain information with the relevant social network such as your app ID, access token and the referring URL.

Where you opt to share content on social media platforms, the video, username and accompanying text will be shared on that platform or, in the case of sharing via instant messaging platforms such as Whatsapp, a link to the content will be shared.

Service Providers

We provide information and content to service providers who support our business, such as cloud service providers and providers of content moderation services to ensure that the Platform is a safe and enjoyable place.

Analytics providers

We use analytics providers to help us in the optimisation and improvement of the Platform. Our third party analytics providers also help us serve targeted adverts (if you have chosen to receive personalized advertising from us and/ or our partners).

Advertisers and Advertising Networks

We share information with advertisers and third party measurement companies to show how many and which users of the Platform have viewed or clicked on an advertisement. We share your device ID with measurement companies so that we can link your activity on the Platform with your activity on other websites; we then use this information to show you adverts which may be of interest to you.

Our Corporate Group

We may also share your information with other members, subsidiaries, or affiliates of our corporate group, to provide the Platform including improving and optimising the Platform, preventing illegal use and supporting users.

Law Enforcement

We will share your information with law enforcement agencies, public authorities or other organisations if legally required to do so, or based on our legitimate business interests if such use is reasonably necessary to:

- comply with legal obligation, process or request;
- enforce our [Terms of Service](#) and other agreements, policies, and standards, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

Public Profiles

Please note that if your profile is public, your content will be visible to anyone on the Platform and may also be accessed or shared by your friends and followers as well as third parties such as search engines, content aggregators and news sites. You can change who can see a video each time you upload a video. Alternatively, you can change your profile to default private by changing your settings to 'Private Account' in 'Manage my account' settings.

Sale or Merger

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets (whether a result of liquidation, bankruptcy or otherwise), in which case we will disclose your data to the prospective seller or buyer of such business or assets; or
- if we sell, buy, merge, are acquired by, or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets.

5. Where we store your personal data

The personal data that we collect from you will be transferred to, and stored at, a destination outside of the European Economic Area ("EEA").

Where we transfer your personal data to countries outside the EEA, we do so under the Commission's model contracts for the transfer of personal data to third countries (i.e. standard contractual clauses) pursuant to 2004/915/EC or 2010/87/EU (as appropriate). For a copy of these Standard Contractual Clauses, please contact us at support@praaktis.com.

6. Your Rights

You have the following rights:

- The right to request free of charge (i) confirmation of whether we process your personal data and (ii) access to a copy of the personal data retained;
- The right to request proper rectification or removal of your personal data or restriction of the processing of your personal data;
- Where processing of your personal data is either based on your consent or necessary for the performance of a contract with you and processing is carried out by automated means, the right to receive the personal data concerning you in a structured, commonly used and machine-readable format or to have your personal data transmitted directly to another company, where technically feasible (data portability);

- Where the processing of your personal data is based on your consent, the right to withdraw your consent at any time without impact to data processing activities that have taken place before such withdrawal;
- The right not to be subject to any automatic individual decisions, including profiling, which produces legal effects on you or similarly significantly affects you unless we have your consent, this is authorised by Union or Member State law or this is necessary for the performance of a contract;
- The right to object to processing if we are processing your personal data on the basis of our legitimate interest unless we can demonstrate compelling legitimate grounds which may override your right. If you object to such processing, we ask you to state the grounds of your objection in order for us to examine the processing of your personal data and to balance our legitimate interest in processing and your objection to this processing;
- The right to object to processing your personal data for direct marketing purposes; and
- The right to lodge complaints before the competent data protection regulator.

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

Please send an e-mail to us if you would like to exercise any of your rights support@praaktis.com.

7. The security of your personal data

We take steps to ensure that your information is treated securely and in accordance with this policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, for example, by encryption, we cannot guarantee the security of your information transmitted via the Platform; any transmission is at your own risk.

We have appropriate technical and organizational measures to ensure a level of security appropriate to the risk of varying likelihood and severity for the rights and freedoms of you and other users. We maintain these technical and organizational measures and will amend them from time to time to improve the overall security of our systems.

We will, from time to time, include links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

8. How long we keep your personal data

We retain your information for as long as it is necessary to provide you with the service so that we can fulfil our contractual obligations and rights in relation to the information involved. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for longer in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Platform, we store your information in an aggregated and anonymised format.

9. Information relating to children

Praaktis is not directed at children under the age of 13. If you believe that we have personal data about or collected from a child under the relevant age, please contact us at support@praaktis.com.

10. Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at support@praaktis.com and we will

endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the relevant data protection authority.

11. Changes

We will generally notify all users of any material changes to this policy, through a notice provided via the Platform. However, you should look at this policy regularly to check for any changes. We will also update the “Last Updated” date at the top of this policy, which reflects the effective date of such policy. Your continued access to or use of the Platform after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop accessing or using the Platform.

12. Contact

Questions, comments and requests regarding this policy should be addressed to support@praaktis.com.