

WOLF3D MOBILE APPLICATION PRIVACY POLICY

Wolfprint 3D OÜ (**We**) is committed to protecting and respecting your privacy.

I SCOPE OF POLICY

This policy applies to your use of:

- The WOLF3D mobile application software (**App**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**).

This policy sets out the basis on which any personal data We collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of clarity, the data controller is Wolfprint 3D OÜ of Pardi tn 2d, Pärnu linn, Pärnu maakond, 80015, Estonia.

II INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- **Information you give us (Submitted Information):** This is information you give us about you by filling in forms on the App, or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you register to use the App, download the App, subscribe to any of our Services, search for an App or Service, and when you report a problem with an App or our Services. If you contact us, We will keep a record of that correspondence. The information you give us may include your name, address, e-mail address, age, username, password, registration information and photograph.
- **Information we gather via the App (Gathered Information):** this is visual information that is gathered via the forward facing camera of your Device for the purpose of providing Services.
- **Information we compile based on Submitted and Gathered information (Compiled Information):** This is a 3D model of your face that we create as a part of our Services and that it can be used as an avatar in third party applications (**Avatar**). Compiled information also includes any residual visual information necessary for the creation of the Avatar (including photographs).
- **Information we collect about you and your device.** Each time you use our App we will automatically collect the following information:
 - technical information, including the type of mobile device you use, your mobile operating system and the type of mobile browser you use (Device Information);
 - photos stored on your Device (Content Information);

- details of your use of our App including, but not limited to traffic data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access (Log Information).

III COOKIES

We use cookies to distinguish you from other users of the App or Appstore. This helps us to provide you with a good experience when you use the App and also allows us to improve the App.

IV USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- Submitted Information: We use this information to create for you a personalised account and to guarantee the quality of Services provided to you.
- Gathered information: We use this information solely for the purpose of creating the Avatar;
- Compiled information: We use and forward this information to third parties so that you could use the personalised Avatar in our App and also apps of the aforementioned third parties;
- Device information: We use your device information to optimise the picture quality for the purpose of creating your Avatar;
- Content Information: We use Content information solely for the purpose of compiling your Avatar;
- Log information: We use Log information to gather anonymized statistics and for further development and improvement of the App software.

We do not disclose information about identifiable individuals to our advertisers, but We may provide them with anonymous aggregate information about our users (for example, We may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We will use of the personal data We have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

V LEGAL GROUNDS OF PROCESSING DATA

We process your data only where we have legal grounds to do so. In the context of the use cases described above, we are processing your data only where processing is necessary for the performance of a contract to which you are a party – i.e. a service contract between you and us.

VI DISCLOSURE OF YOUR INFORMATION

We will not disclose personal information we collect from you, other than to the following third parties:

- *Cloud-server service provider.* We store all our data in Amazon servers in the USA (Amazon Web Services).
- *Third-party software service providers.* We will disclose the personal information we collect from you in such cases where you request such a transfer via the App. For instance in cases where you request your Avatar to be forwarded to a third-party software service provider. The list of such service providers is ever-changing and they may be located around the world.
- *Other group members.* We have the right to disclose your personal information to any member of our group, which means our subsidiaries and our ultimate holding company and its subsidiaries. Such transfer will only be done if it is necessary for the provision of Services to You.
- *Asset transfer parties.* In the event that We sell or buy any business or assets, in which case We will disclose your personal data to the prospective seller or buyer of such business or assets. If Wolfprint 3D OÜ or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- *Legal authorities, institutions and other parties under law.* If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request. In order to:
 - investigate potential breaches; or
 - protect the rights, property or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we do share your information with third parties, we will require such third parties to comply with this Privacy Policy and maintain appropriate security to protect your information from unauthorised access or processing, unless we have no ability to do so (for example, where we are sharing information with regulatory authorities or courts).

Before we use your personal information for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. In such case we will notify you about those activities and offer to opt out via email.

VII ADDITIONAL INFORMATION YOU SHOULD KNOW ABOUT THIRD PARTIES

Our App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App is advertised).

If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

VIII HOW LONG DO WE STORE YOUR DATA

We only store your data as long as you are registered to use the App or are otherwise subscribed to use any of our Services – i.e. as long as we have a contractual relationship.

Once you delete your account via the App or otherwise opt-out of our Services we will immediately delete or anonymize your data.

IX WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on Amazon Web Service servers in the US. We may also use EU servers from time to time. Amazon Web Service is certified under the EU-US Privacy Shield (for more information visit <https://aws.amazon.com/compliance/eu-us-privacy-shield-faq/>).

Where We have given you (or where you have chosen) a password that enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted via the App; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

X DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) who will act as the main contact for you in relation to any request, questions or suggestions you may have regarding how We process your data.

Additionally, the DPO is the one to turn to in order to exercise one of your rights under this Privacy Policy.

In order to contact the DPO, feel free to write an email at info@wolf3d.io with your request.

XI YOUR RIGHTS

You have significant rights in relation to data processing carried out by us.

Under this Privacy Policy you have the right to:

- be informed as to what we do with your personal information;
- access your information;
- rectification if the information We hold about you is inaccurate or not complete;
- erasure if We do not have a legal reason to continue to process and hold it;
- restrict how we process your data;

- data portability - to obtain and reuse your personal data for your own purposes;
- withdraw your consent at any time;
- object to processing your data;
- report any misuse of your personal information.

You can exercise any of the above rights at any time by contacting our Data Protection Officer at info@wolf3d.io.

XII CHILDREN'S PRIVACY

You must be at least 16 years old to use this App.

Where your Submitted Information, Gathered information, Compiled information or Content Information contain the personal data of children under the age of 16 years, you acknowledge that you must have obtained the consent of the child's parent or guardian prior to posting or creating such information using the App.

In the event that we learn that your Submitted Information, Gathered information, Compiled information or Content Information contains personal data of a child under the age of 16 years, we reserve the right to remove and delete the information without your consent or prior notice to you. If you believe that any information appearing on the App contains the personal data of a child under 16 years, please contact our Data Protection Officer at info@wolf3d.io.

XIII CHANGES TO PRIVACY POLICY

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail **OR** when you next start the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

XIV CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to our Data Protection officer at info@wolf3d.io.