

## **WHAT2SHARE KEYBOARD PRIVACY POLICY**

This Privacy Policy governs your access to and/or use of the iOS What2Share application (the “App”), which is designed to extremely improve your sharing options through the convenience of a keyboard. The data collected will be treated in compliance with the provisions of Italian Legislative Decree n. 196/2003 ("Privacy Code") as amended, regarding the protection of personal data and information. Pursuant to article 13 of the Privacy Code, we inform our Users (or “you”) of the following.

By downloading and/or using the Service, you accept and consent to the processing of your information in accordance with this Policy. If you do not understand this Policy or you do not agree with it or any part of it, then you should immediately stop using the App.

### **1. THIRD-PARTY KEYBOARD WARNINGS**

First of all it should be pointed that you may encounter an alert when enabling full access for the What2Share keyboard on your device, warning that third parties keyboard are permitted to access, collect and transmit the data you type and other personal information, including bank account, credit card numbers, street addresses. **We assure you that none of this is in our interest nor ever will happen.** What2Share is not and never will be designed to collect, log, store nor transmit any of this type of data. We require full access with the only purpose to ensure you the possibility to explore and use all the features of the What2Share keyboard, such as view Gifs and Memes, and send or save every content you find on or create with the App, which can be accessed and used only allowing full-access and thereby the possibility to connect to the internet and share data between the keyboard itself and its containing App.

### **2. DATA CONTROLLER AND MANAGER**

The data controller and manager are respectively dr. Sonia Pivetta and dr. Filippo Giove. For any questions or issues concerning the App or this Policy, as well as to exercise your rights as described below in §8 *USERS' RIGHTS*, please contact us at [info@w2s-keyboard.com](mailto:info@w2s-keyboard.com).

### **3. CATEGORIES OF PROCESSED INFORMATION**

We do not request, receive or collect any of your personal information, meaning those designed to identify you as an individual (including, but not limited to, your name, birthdate, credit card numbers and billing information), nor your sensitive data. Nevertheless, when you access and/or use the App we automatically receive information which can uniquely identify the device you are

using, but not you personally (e.g. device model and name, operating system name and version and similar). Furthermore, we receive information about your country and the product you purchase. Please note that all of this information is received and collected in an aggregated and anonymized way for internal research, data analysis and statistical purposes, in order to understand our users' preferences and offer them the contents they are interested in.

In addition, your prior consent, certain features of the App require access to your device's image gallery and image storage application. We do not collect any information, photos, videos nor other contents from your image gallery and/or image storage application. If at any time you decide to withdraw your consent, you can either change the settings if provided by your device operating system, or uninstall our Service.

#### **4. MANDATORY DATA PROVISION**

We automatically receive the abovementioned information as a part of the standard functioning of the App, Given that you cannot access and/or use the app without us receiving such anonymized and aggregated data, if you do not want this to happen, please do not use our App.

With regard to the access to your device's image gallery and image storage application, you can either deny your consent at the beginning or withdrawn it at any time by changing your device settings. Please note that in such events, some features of the App may not function properly (e.g. without limitation, photo and marker functionalities).

#### **5. PROCESSING ARRANGEMENTS AND PROTECTION OF PERSONAL INFORMATION**

Your information is collected and processed electronically with automated means and it is kept for no longer than is reasonably necessary for our business purposes or for legal requirements. Appropriate technical measures are implemented to protect your data against unauthorized or unlawful processing and to prevent accidental loss, destruction or damage. Nevertheless, although we do all our best to protect your data, the transmission of information via the internet is not completely secure, so that any transmission is at your own risk.

#### **6. SHARING AND DISCLOSING OF INFORMATION**

6.1 Service Providers: in order to maintain or enhance the Service we may disclose your information to our service providers, who are involved in the provision, distribution, delivery and support of the Service on our behalf (e.g. without limitation, bill payment processing and database management).

6.2 Compliance with law: we reserve the right to disclose your information to any court, regulator, law enforcement agency or government authority when in good faith belief we are

persuaded that it is necessary to comply with a legal obligation, in accordance with any applicable law, rule or regulation. We may also disclose your information in order to comply with legal processes or to take action regarding suspected illegal activities, with the aim to protect our rights, safety, reputation and properties, or that of our users, affiliates and partners.

6.3 Business events: should we sell or otherwise transfer part or the whole of our assets to another company (e.g. in the event of a merger, acquisition, bankruptcy, dissolution, liquidation and reorganization), we may transfer all users' information to the relevant third party and the latter's Privacy Policy would apply thereafter.

6.4 Professional firms: we may also disclose aggregated and anonymized information to the professional firms which provide us assistance and advice in accounting, administrative, legal, tax and financial matters.

## **7. THIRD PARTY SERVICES**

Our Service may contain links to third parties websites, products and services (e.g. if you click on a banner or other types of advertisements, you will be directed to that third party's service or website). Moreover, your access and/or use of certain features of the App may be supplied by third party services, which are integrated with ours and governed by their own terms and conditions and privacy policies (e.g. Meme and Gif contents are provided respectively by Memegenerator.com and Giphy.com).

The presence of links to third parties service and/or the fact that they are integrated with our Service is not an endorsement, authorization or representation of our affiliation with that third party. You recognize and agree that we are not liable for third parties products, website or services, nor for the practices they employ when treating the information you provide to them. We encourage you to review the terms and conditions and the privacy policies of every third party Service you visit and/or use, including those third parties you interact with through the App.

## **8. USERS' RIGHTS**

Pursuant to Article 7 of Privacy Code, at any time you have the right to obtain the confirmation of the existence of data about you and to verify the purposes for which they are processed. Moreover you have the right to request the updating, correction, amendment, integration, erasure or locking of your data, and to object, in whole or in part, to the processing. You can also request to receive information about the subjects who know or may become aware of your data. To exercise these rights you can contact us at [info@w2s-keyboard.com](mailto:info@w2s-keyboard.com).

Effective: 08.07.2015

Last Update: —