

LIGHTRICKS - PRIVACY NOTICE

Lightricks Ltd. ("Lightricks", "we", "us", "our") provides users with apps designed to edit and perfect photos, create images and share your creations through social media and email (the "Apps"). Our Apps include Facetune, Facetune 2, Enlight, Enlight Photofox, Enlight Videoleap, Enlight Quickshot and more. This Privacy Notice (the "Notice") describes the how we collect and use your personal data through our Apps. It also describes the rights and options available to you with respect to your personal information.

WHO WE ARE

We are the data controller of the personal data we collect via the Apps.

Lightricks Ltd. is the data controller of the personal data we collect via the Apps and use and share as further described below.

We are located at Professor Racah St, Building 5.4, Jerusalem, Israel, 91904.

CONTACT US

How to contact our Data Protection Officer

If you have any questions or requests concerning your personal data or about our privacy practices and policies, you may contact our Data Protection Officer at: dpo@lightricks.com

How to contact our European representative

The European representative of Lightricks, for purposes of this Notice will be Lightricks UK Inc., If you are within the European Economic Area, you may contact our European representative the at the following address: eu.representative@lightricks.com

PERSONAL DATA WE COLLECT

We collect analytical information about your use of the Apps.

When you use our Apps, we will record and collect the following information (collectively, "**Analytical Information**"):

1. Unique operational identifiers, that allow us to identify a user across multiple devices.
2. Unique advertising identifiers, We use it for advertising as we further describe in this Notice.
3. IP address from which you access the Apps. We can also identify your geo-location via your IP address.
4. Device information, including device type, operating system version, time zone and your preferred languages.
5. Usage information, such as the time and date you accessed the Apps, the features you used, your preferences and for how long you use an App every time you launch it.

If you made an in-app purchase – we will receive your receipt from Apple

If you choose to subscribe to our VIP/PRO accounts or to purchase items through our Apps, we will collect the information provided by Apple on the respective invoice ("**Purchase Information**").

The overall personal data outlined above will be referred to as the "Information".

SOURCE OF PERSONAL DATA

We do not collect the Information we disclosed above only by ourselves. We obtain some of it from the following sources ("Vendors"):

- 1. **AppsFlyer**, Inc. AppsFlyer's privacy policy is available [here](#). you can opt-out of AppsFlyer Analytics tracking by sending an email to: privacy@appsflyer.com;
- 2. **Taplytics, Inc.**; Taplytics' privacy policy is available [here](#).
- 3. **Firebase** (Google); Taplytics' privacy policy is available [here](#).
- 4. **Facebook**; Facebook's privacy policy is available [here](#).

The Vendors may also collect your Information through their designated code incorporated in our Apps. We use their services for the purposes set forth below.

HOW WE USE PERSONAL DATA

We use your Information to improve and enhance the Apps and our services.

We use your Information for the following purposes:

- 1. Maintain and improve our Apps;
- 2. Develop new services and features;
- 3. Enrich the content and features available on our Apps;
- 4. Adapt the Apps, its features and functionality to users' preferences;
- 5. Analysis of marketing efficiency.

The legal basis under EU law for processing and collecting Analytical Data is our legitimate interests in operating our Apps, ongoing management of our business and business development.

We also use your Information to provide you with personalized services

Subject to your informed consent, in some of our products (Facetune on the Google Play Store) we will use the Analytical Information we obtain to serve you with advertisements to products and services that we believe may suit your interests.

The legal basis under EU law for collecting and processing your Information for profiled advertising purposes is your explicit consent.

WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS

We will not share your information with third-parties, except in the events listed below or when you provide us your explicit and informed consent

We share your Information with the service providers who assist us in operating our business and the Apps

We will share your Information with our service providers who assist us to operate our Apps. Our service providers are authorized to use your Information only as necessary to provide us with their services and not for their own purposes. We do not sell your Information to third parties.

We will share your Information

If you have breached the terms of use of the Apps, this Notice or any other agreement you have with Lightricks, abused your rights to use the Apps, or

- when you violate the terms of your engagement with Lightricks** violated any applicable law - Your Information will be shared with third parties (such as legal counsels and advisors), who handle the matter on our behalf, or with the competent authorities.
- We will share your Information if we are legally required.** If we are bound to disclose your information by a judicial order or by a governmental or regulatory authority acting within its legal authority, we will comply and share the Information.
- We will share your Information if we change Lightrick's business structure.** If we organize the operation of our company within a different framework, or through another legal structure or entity (such as due to a merger or acquisition) - we will share your Information to enable the structural change. However, the receiving party will be bound by this Notice.

SECURITY AND DATA RETENTION

- How long will we retain your Information.** We retain personal data as long as we need it for the purposes for which it was obtained or until you ask to delete it. If you ask us to delete the Information, we may still have to retain it to comply with our legal obligations, resolve disputes and enforce our agreements.
- We implement measures to secure your Information** We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed, and you cannot expect that the Service will be immune from information security risks.

INTERNATIONAL DATA TRANSFERS

- We will transfer your Information to third countries only in accordance with applicable data protection laws.** We are based in the State of Israel. The Information we collect from you will be processed in Israel, which is recognized by the European Union ("EU") as having adequate protection for personal data.
- We will only transfer your Information from within the EU to other jurisdictions if they have been deemed to have an adequate level of data protection by the EU, or as otherwise permitted by the applicable data protection laws.

YOUR EU RIGHTS

- You have the right to access, update or delete your Information and obtain a copy of your Information.** If you are in the EU, you have the right to access the personal information about you that we store on our systems, and have us update, correct or delete it. You are also entitled to obtain from us your Information (excluding data we obtained from other sources) in a structured, commonly used and machine-readable format, and have the right to transmit those data to another data controller. If you wish to exercise any of these rights, contact

us at contact@lightricks.com.

You have a right to submit a complaint to the relevant supervisory data protection authority.

If you are in the EU, you can lodge a complaint to the supervisory authority under the General data Protection Regulations ("GDPR"), in particular in the Member State of your residence, place of work or where the alleged infringement of the GDPR occurred. For a list of supervisory authorities in the EU, click [here](#).

MINORS

You must be at least 13 years of age to use the Apps.

The Apps are not intended for minors under the age of 13. IF YOU ARE UNDER THE AGE OF 13 YOU MAY NOT USE THE APPS.

CHANGES TO THIS PRIVACY NOTICE

If we change this Notice, we will notify you in advance.

From time to time, we may change this Notice. If you are a registered user, we will provide you notice of such changes through the Apps. In case of legal requirement, we may also introduce immediate changes to the Notice and require that you accept them. In any event, if you do not consent to the amended Notice, we may terminate your user account. The latest version of the Notice will always be accessible on the Apps.

Last Update: May 24, 2018