



## Privacy Policy-SubsTender

This privacy policy is provided by **SubsTender**. We are committed to protect your privacy. You can learn from this privacy policy that how we may collect, use, share your information when you use the Software and Services. And regarding your information, we declare the rights and options available to you. If you do not agree to the terms and conditions in our privacy policy, you can stop to use the Software & Services.

We regularly examine and update the privacy policy, so you can check our latest privacy policy in time.

### Information We Collect and Use

As you use the Software and Services, we may collect and store the following type of information:

#### 1. Technical Information

For improving and customizing the Software and Services, we collect certain technical information of your device, including without limitation: the type, name and version of your operating system and other software, ISP (Internet Service Provider), GPS (Global Position System), IP (Internet Protocol) address, identifier for anonymous users, device configuration and identifiers, ID for advertiser (Identifier for Advertisers used in Android, etc.), and the setting of Software and Services.

#### 2. Usage and Social Networks Information

For providing you personalized content and services, including through the delivery of targeted interest-based advertisements from us or our partners; and improving the quality and operation of the Software and Services, we collect certain information regarding your use and interaction of your device, including the Software and Services and other software. Such as when and how you use the internet browser and internet search of applications, how you view and use the offerings and advertisements, and response to them. Your interactions on social networks through the Software and Services.

#### 3. Registration and Support Related Information ☐ If Applicable ☐

To notify you of the Software and Services updates, we may collect the information that you provide when you register the software and services; such as your name, telephone numbers, e-mail address. To provide you with support and handle your complaints or feedback, we also collect the information if you communicate with us by e-mail or our support section, such as your name, e-mail address and any information submitted by you. When you use the Software and Services, we automatically generate an anonymous internal user ID (which does not personally identify you), which is assigned to your use of the Software and Services (the "User ID") and may be combined with any of the above information.

We have no intention to collect any personal identification information ☐ "PII" ☐ except the registration and user support specified in the privacy policy, but there may be errors during the process of collection of data, which may contain PII. We will regularly check and update and timely identify and remove unwanted information of software and services collected unintentionally.

### Information We Share with Third Parties

We may share information with the third party under the following circumstances:

1. We are required by laws to disclose your information.
2. The team experiences the combination, acquisition, change of control power of other companies and other business transition.
3. We may share your information with certain third-party companies, such as advertising platform, and we will require such third parties to (i) guarantee the security of data, (ii) never use the data for the purpose other than providing services to us, and (iii) use the data only according to the privacy policy.

In any case other than the above, without your prior consent ☐ we will not share your personal identity information with the third party.

### Content of Third Parties

While using the software and services, certain third parties may enable you

to provide content to them, in the form of gadgets, buttons, websites, advertising links etc. We consider it as third-party contents and services, which are subject to their privacy policies. We would not review and guarantee such third-party contents and services. Before you using or accessing such third-party contents and services, we recommend that you read the terms or conditions of their privacy policies. You shall be aware of using them and expressly relieve us from any and all liability arising from your use of such Third Party Content and Services.

You can find out how the third parties use your data through the following links:

Google:<https://policies.google.com/technologies/partner-sites>

#### Information Security and Data Rights

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. We will only keep your personal information for as long as necessary and in any event in relation to personal information collected by us through the Software and Services. We will keep the information we collect in accordance with this Privacy Policy to achieve our business and/or operational purposes or to comply with legal requirements. We have implemented safeguard procedures to protect your information according to industrial standards, and we have restricted access to your information on the server, which is under encryption protection.

Nevertheless, since the Internet is not a 100% secure environment, we cannot guarantee that the information you deliver to us will be 100% secure. Meanwhile, we establish data nodes all around the world to back up data to be under supervision by local laws.

After you uninstall our software or stop using our services, we will delete all your data within three months. If you clear your data through internal software clicks, we will immediately delete your locally saved data and delete all your data on the server within one month.

If you are the user of Europe, you have a right to (subject to a limited number of exceptions): (i) request access to and rectification or erasure of your personal information; (ii) obtain restriction of processing or to object to processing of your personal information; and (iii) ask for a copy of your personal information to be provided to them, or a third party, in a digital format. You also have the right to lodge a complaint about the processing of your personal information with your local data protection authority in the EEA. If you want to exercise this right, please contact us by email at:

**[lerosua+substender@gmail.com](mailto:lerosua+substender@gmail.com)**

#### International Transfers

If you are located in the EEA, personal information collected from you via the Software and Services, will be transferred to recipients in countries located outside the EEA which do not provide a similar or adequate level of protection to that provided by countries in the EEA. You hereby expressly consent to the transfer of your personal information to recipients, as described in this Privacy Policy, which are located outside the EEA.

#### Children

We comply with the Children's Online Privacy Protection Act (COPPA) and the General Data Protection Regulation (GDPR). We do not intend to collect any personal identification information of children under the age of sixteen (16), but there may be errors during the process of collection of data. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we would take action to ensure that such information is deleted from our server.

#### Usage Conduct

We pay close attention to our intellectual property protection. All content, images, design, graphics, text, logos, buttons, interfaces, icons, audio and video clips, and the selection and arrangements of the Software and Services thereof are our exclusive property, and are protected by Berne Convention, international copyright laws and other applicable laws and regulations.

You agree to use the Software and Services only for lawful purposes. We

may, without incurring any liability to you, terminate access by you or suspend any access to all or part of the Software and Services, without notice, for any conduct by us, in our sole discretion, believes is in violation of any applicable law or this privacy policy, or is harmful to the interests of another user, a third-party, a sponsor, a licensor, a service provider, a merchant.

#### Contact Us

If you have any question or comment about this Policy, you can contact us by **lerosua+substender@gmail.com**

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