Privacy Policy

Last Updated: June 27th 2018

OUR COMMITMENT TO YOU

At 24apps, your privacy is a top priority. We appreciate that you put your trust in us when you provide us with your information and we do not take this lightly.

We do not compromise with your privacy. We design all of our products and services with your privacy in mind. We involve experts from various fields, including legal, security and others to make sure that no decision is taken without respect for your privacy.

We strive to be transparent in the way we process your data. Because we use many of the same online services you do, we know that insufficient information and overly complicated language are common issues in privacy policies. We take the exact opposite approach: we have written our Privacy Policy and related documents in plain language. We actually want you to read our policies and understand our privacy practices!

We work hard to keep your information secure. We have teams dedicated to keeping your data safe and secure. We constantly update our security practices and invest in our security efforts to enhance the safety of your information.

PRIVACY POLICY Welcome to 24apps's Privacy Policy. Thank you for taking the time to read it!

If you live outside the EEA, the company responsible for your information is:

We appreciate that you trust us with your information and we intend to always keep that trust. This starts with making sure you understand the information we collect, why we collect it, how it is used and your choices regarding your information. This Policy describes our privacy practices in plain language, keeping legal and technical jargon to a minimum.

24apps GmbH Gadollaplatz 1

1. WHO WE ARE

If you live in the European Economic Area ("EEA"), the company that is responsible for your information under this Privacy Policy (the "data controller") is:

Austria

8010 Graz

29 Wells Avenué, Suite 300

Yonkers, NY 10701 ATTN: Privacy Officer/Legal Dept.

2. WHERE THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to websites, apps and other services operated by 24apps. For simplicity, we refer to all of these as our "services" in this Privacy Policy. To make it extra clear, we've added links to this Privacy Policy on all applicable services.

3. INFORMATION WE COLLECT It goes without saying, we can't help you have an awesome user experience without some information about you, such as your IP Address

info, we go into more detail below.

information from third parties, like when you downloaded our apps from a certain advertising campaign of ours. If you want additional Information you give us You choose to give us certain information when using our services. This includes:

in our VPN 24 app. We also collect information generated as you use our services, for example app events in Call Recorder 24, as well as

• Our Call Recorder 24 app records your call in a sound file (like an mp3 file). We store this sound file on a secure server without any personally identifiable information (such as your name or phone number). We do not listen to or analyze these recordings.

Depending on your device, Apple and Android system will ask for your permission before allowing us to access these features.

 Your IP Address in both Call Recorder 24 and VPN24 - however we delete it after 7 days. If you consent, we may send you email marketing.

If you consent, the app may access your contact list in our Call Recorder 24 app. However we don't have access to your contacts.

- If you contact our support team, we collect the information you give us during the interaction.
- Information we receive from others
- In addition to the information you provide us directly, we receive information about you from others, including: • We may receive information about you from our partners, for instance where Call Recorder 24 ads are published on a partner's

website or platform (in which case they may pass along details on a campaign's success).

From when you open the App:

Device information

device, please follow the instructions below.

Opting Out on iOS Devices Such as iPhones, iPads or iPods

Open the Settings app on your device

Go to "Google"

paid version of the app.

To communicate with you

from users.

Policy.

laws.

For corporate transactions

To enforce legal rights

information.

Comply with legal requirements

6. HOW WE SHARE INFORMATION

With other IAC Group companies

about how your information is shared with others.

Select Ads

 If you purchase our PRO features, neither Google nor Apple provide us with any personal information of the subscription purchaser (like name, email or payment information). Only an anonymized Subscription ID or Order ID gets transferred to 24apps.

Information collected when you use our services When you use our services, we collect information about which features you've used, how you've used them and the devices you use to access our services. See below for more details:

password-tokens and device country settings. We also use IP addresses to generate aggregate, non-identifying information about how VPN 24 is used or develop features to protect us against attacks.

o Our servers automatically record information about how a person uses the app, including app install source, IP addresses, app versions, receipt, app name, operating systems, device models, device languages, subscription status, transient user-tokens,

We do not connect this information to your internet browsing activities when using our VPN, nor do we log this information

In our VPN24 app, we collect information from and about the device(s) you use to access our services, including:

when you use VPN to browse the internet. From moment you turn on VPN24 software:

 Your browsing activity becomes encrypted, meaning it becomes invisible to ISPs, third party snoopers and even us. We have a strict no-logs policy when it comes to seeing user activity online. We only keep the IP addresses for 7 days and the

IP addresses are not related to your internet traffic routed through our VPN servers. In our Call Recorder 24 app, we collect information from and about the device(s) you use to access our services, including:

information about your activity on our services, for instance how you use them (e.g., date and time you logged in, features

AdvertisingID and Apple's IDFA, both of which are randomly generated numbers that you can reset by going into your

device's settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or

 hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, app version, app name, type of user (subscription/free), advertising IDs (such as Google's

you've been using, anonymized user-tokens & password-tokens, advertising that you click on).

 information on your wireless and mobile network connection, like your service provider and signal strength. 4. COOKIES AND OTHER SIMILAR DATA COLLECTION TECHNOLOGIES As described in Sections 3 and 5 of this Privacy Policy, we sometimes work with third parties to deliver ads or offers. Sometimes we or these third parties do so through a mobile "SDK." The SDK is a bit of computer code that app developers can include in their apps to

enable data to be collected and ads to be shown. We may use this and similar technology to deliver certain advertising through mobile applications and browsers based on data associated with your mobile device, and we may work with third parties who likewise embed their SDKs into our services, for third party advertising. If you'd like to opt-out from having ads tailored to you in this way on your mobile

other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address).

change the manner in which their "opt out" settings work at any time): Please note that if you opt out through these settings, you will continue to receive advertising after you opt-out, but it may not be tailored to your interests. For instance, that advertising may be based on your real-time or "contextual" application usage or general location inferred from IP address.

If you wish to opt out of interest-based cross-application tracking through your mobile device, you can do so through your device

"settings", as follows (but please note that the below is for informational purposes only and Apple, Google, or other device platforms may

setting Limit Ad Tracking to 'ON'. On an iPhone 6 for example, you can do this by clicking on Settings -> General -> Privacy -> Advertising and toggling "Limit Ad Tracking" to 'ON'. Our systems are designed to respect your choice and not use your personal information to provide interest-based advertising when this setting is ON. Opting Out on Android Devices If you have an Android device and would like to opt out of mobile interest-based or "cross-app" advertising, you may do this as follows:

If you have an Apple device, you can opt out of mobile interest-based or "cross-app" advertising by updating to iOS 6.0 or higher, and

 Opt out of interest-based ads More information on our use of cookies on our websites can be found in our Cookie Policy.

5. HOW WE USE INFORMATION The main reason we use your information is to deliver and improve our services. Additionally, we use your info to help keep you safe and

to provide you with advertising. Read on for a more detailed explanation of the various reasons we use your information, together with

Develop, display and track content and advertising (sometimes tailored to your interests) on our services and other sites and to

• For the purposes of European law, these ad partners are independent controllers of your information, which means that they are

measure its effectiveness. When you are on our services, third-party ad partners may provide you with advertising based upon your

practical examples. To administer your account and provide our services to you

Provide you with customer support and respond to your requests

 We use your email address, name, country and language for customized marketing purposes. To serve you relevant offers and ads

interests. These companies may use technologies to collect data about users, including non-precise location data, to help them tailor relevant ads and measure ads' effectiveness. These companies may collect this data through SDKs or from users who view or interact with their advertisements. If you do not wish to receive in-application advertising, in some cases you can upgrade to the

responsible for providing and complying with their own policies relating to any personal information they obtain in connection with the services.

any personally identifiable information that you submit within the mobile application.

interest. To send you non-marketing emails or messages, such as those related to transactions, your account, security, or product changes. Examples of service-related messages include an email address confirmation/welcome email when you register your account, service availability, modification of key features or functions and correspondence with our support team.

With your consent, to send you email marketing in order to provide you with information about services that you may find of

To improve our services and develop new ones • Conduct research and analysis of users' behavior to improve our services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behavior). This software may record information such as

Develop new features and services (for example, we may decide to build a new feature further to requests or feedback received

how often you use the services, what happens within the services, aggregated usage, performance data, app errors and debugging information, and where the apps were downloaded from. We do not link the information we store within the analytics software to

24apps uses the Google Analytics tool Firebase in order to carry out analysis on personal information which is gathered by us to carry out data analysis. Any personal information (including App Identifiers) which are provided to Google will become subject to Google's privacy policy which is located here: www.google.com/privacy.html.

Perform data analysis to better understand and design countermeasures against these activities

 Retain data related to fraudulent activities to prevent against recurrences To ensure legal compliance

• Provide our service to you: Most of the time, the reason we process your information is to perform the contract that you have with

Legitimate interests: We may use your information where we have legitimate interests to do so. For instance, we analyze users'

Assist law enforcement Enforce or exercise our rights, for example our Terms of Service To process your information as described above, we rely on the following legal bases:

To prevent, detect and fight fraud or other illegal or unauthorized activities

behavior on our services to continuously improve our offerings and we process information for administrative, fraud detection and other legal purposes. Consent: From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time where indicated in the services or by contacting us at the address provided at the end of this Privacy

us. For instance, as you go about using our VPN24 app, we need your IP address to make the app work.

With our service providers and partners • We use third parties to help us operate and improve our services. These third parties assist us with various tasks, including data hosting and maintenance, analytics, marketing, advertising and security operations.

24apps is part of the IAC Group family of businesses which, as of the date of this Privacy Policy, includes websites and apps such as Ask

• for legitimate business purposes such as corporate audit, analysis and consolidated reporting as well as compliance with applicable

We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring,

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect

Sharing of information laid out in Section 6 sometimes involves cross-border data transfers, for instance to the United States of America and other jurisdictions. The United States, European Economic Area ("EEA") Member States, and other countries all have different laws. When your information is moved from your home country to another country, the laws and rules that protect your personal information

Since our goal is to provide the best services we can to you, the main sharing of users' information is with service providers and partners who assist us in operating the services, with other IAC Group companies and, in some cases, legal authorities. Read on for more details

Applications, Apalon and Slimware (for more details, click http://iac.com/). We share your information with other IAC Group companies to: assist us in technical processing operations, such as data hosting and maintenance, finance, legal, HR and accounting assistance, securing our data and systems and fighting against spam, abuse, fraud, infringement and other wrongdoings.

When required by law We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

• We follow a strict vetting process prior to engaging any service provider or working with any partner.

our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing. With your consent or at your request We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the

obligation or unless we have an overriding interest to retain it.

have to provide a reason for your withdrawal where processing is based on consent.

information, notably where such requests would not allow us to provide our service to you anymore.

For your protection, we may ask you to provide proof of identity before we can answer the above requests.

personal information to transfer to another provider)

reorganization, dissolution, bankruptcy or other change of ownership or control.

in the country to which your information is transferred may be different from those in the country in which you live. The European Commission has adopted standard contractual clauses (also known as Model Clauses), which provide safeguards for personal information that is transferred outside of the EEA. We use these Model Clauses or other suitable safeguards (such as EU-US Privacy Shield to send personal information to some of our third party service providers in the United States, where they are certified to

8. YOUR RIGHTS

of it.

before the information is released.

9. HOW WE PROTECT YOUR INFORMATION

7. CROSS-BORDER DATA TRANSFERS

Depending on your location you may have some or all of the following rights in relation to how we use your personal information: Access: you may request access to your personal information and receive copies of it; Correction: you may have inaccurate/incomplete personal information corrected and updated;

Object to, or Limit or Restrict, Use of Data: you can ask us to stop using all or some of your personal information or to limit our use

Deletion: in certain circumstances, you can request a right "to be forgotten" (this is a right to have your information deleted or our

Consent Management: where we rely on consent to process your personal data, you may withdraw consent at any time. You do not

use of your data restricted). We will honour such requests unless we have to retain this information to comply with a legal

Portability: in certain circumstances, exercise the right to data portability (this is a right to obtain a transferable version of your

We want you to be in control of your information and be aware of your privacy rights, so here are a few key points to remember:

receive such information under the Privacy Shield Program) to permit data transfers from the EEA to other countries.

If you wish to exercise any of these rights, or wish to object to our use of your information, please write to us at the address listed below and we will consider your request in accordance with applicable laws. Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on the rights and

freedoms of another person. For example, we may not be able to accommodate certain requests to object to the processing of personal

If you wish to receive information from our Call Recorder 24 app (which includes information relating to another individual, such as a call recording), the other individual may have to contact our Data Protection Officer to provide their written consent and/or proof of identity

microphone as well as push notifications. Where applicable, you can change your settings on your device to either consent or oppose the collection of the corresponding information or the display of the corresponding notifications. Of course, if you do that, certain services may lose full functionality. <u>Uninstall.</u> You can stop all information collection by an app by uninstalling it using the standard uninstall process for your device. If you

application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.

disclosure or destruction of your personal information. As with all technology companies, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure. We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing

uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and after it is received. We work hard to protect you from unauthorized access to or alteration,

Device permissions. Mobile platforms have permission systems for specific types of device data and notifications, such as camera and

10. HOW LONG WE RETAIN YOUR INFORMATION We retain your information only for as long as is necessary for the purposes set out in this policy, for as long as your account is active or

if there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or

information may need to be kept to prevent a user who was banned for security incidents from opening a new account.

if the information must be kept for our legitimate business interests, such as enforcing our terms or fraud prevention. For example,

Our services are intended for general audiences over the age of 13 years old (or over the age of 16 if you are resident in the EEA). We do not knowingly collect information from children under the age of 13 years old, or 16 years old in the EEA. If you are not over 13 years old (or 16 years old in the EEA) then DO NOT DOWNLOAD OR USE THE SERVICES. If you believe that we may have personal information from

Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints. 11. CHILDREN'S PRIVACY

we collect and use your personal information. They can be reached by contacting DPO@24apps.co.

practices to update our physical, technical and organizational security measures.

13. PRIVACY POLICY CHANGES Because we're always looking for new and innovative ways to help you enjoy our services, this policy may change over time. We will notify you of any material changes so that you have time to review the changes. 14. DATA PROTECTION OFFICER For our European users, our Data Protection Officer is responsible for ensuring your rights are respected and to review and oversee how

24apps GmbH Gadollaplatz 1

Online: DPO@24apps.co

By post:

By post: Mindspark Interactive Network, Inc. 29 Wells Avenue, Suite 300

Yonkers, NY 10701

Österreichische Datenschutzbehörde

Telephone: +43 1 531 15 / 202525 Fax: +43 1 531 15 / 202690

We have recently updated our policies and we are in the process of translating it into several languages. If you do not have an appropriate language option and you have any questions, please contact us. END OF DOCUMENT.

24apps

Apps

Company

Legal Privacy Policy

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately DPO@24apps.co. as needed to provide the services to you. We will also retain and use your information to the extent necessary: to comply with applicable law; to evidence our compliance with applicable law;

or about a child under the age of 13 years old (or over the age of 16 if you are resident in the EEA), please contact us at DPO@24apps.co and we will promptly delete that personal information.

15. HOW TO CONTACT US If you have questions about this Privacy Policy, here's how you can reach us: If you live in the EEA:

8010 Graz Austria If you live outside the EEA:

Online: 24apps@help.mindspark.com

ATTN: Privacy Officer/Legal Dept. Without prejudice to any other rights you may have, if you are located in the EEA, you also have the right to file a complaint against 24apps with the Austrian Data Protection Commissioner ("DPC"), which is 24apps' Lead Supervisory Authority. The DPC's contact details

Hohenstaufengasse 3 1010 Wien AUSTRIA / EUROPE

E-Mail: dsb@dsb.gv.at If you live in the EEA, you may also file a complaint with your local data protection regulator.

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