

Privacy Policy

This Privacy Policy ("Privacy Policy") helps explain our data practices, including the information we collect, use, and share to provide our Services. "Services" mean our website plus any websites, features, applications, widgets, or online services owned or controlled by us and that post a link to this Privacy Policy. This Privacy Policy applies to all of our Services unless specified otherwise. Please note this Privacy Policy applies to our Services exclusively and other terms and conditions may be applicable in addition to it, including but not limited any third-party service providers terms and conditions such as (but not limited to) Apple App Store's, Google Play's and Stripe's terms and conditions and privacy policy etc. By using our Services, you consent to our Privacy Policy.

Information We Collect

We must receive or collect some information to operate, provide, improve, understand, customize, support, and market our Services, including when you install, access, or use our Services.

The types of information we receive and collect depend on how you use our Services. We require certain information to deliver our Services and without this we may not be able to provide our Services to you. For example, you might be asked to provide your mobile phone number to use our Services in the event we implement multifactor authentication.

If our Services have optional features, these may require us to collect additional information to provide such features. You will be notified of such collection, as appropriate. If you choose not to provide the information needed to use a feature, you may be unable to use the feature. For example, you are asked to choose your location upon registration to the Service so that we are able to deliver the Service to you. Permissions can usually be managed through your settings menu on your device.

Information You Provide to Us

By using our Services, you may provide certain personal information to us by completing web or mobile forms, by email, and by communicating with us by other methods. Contact information such as name, address, email address and/or phone

number is typically provided when using these methods. By voluntarily providing us with this information, you represent that you are the owner of such personal information or are otherwise authorized to provide it to us.

We may also collect any personal information you provide when you:

- use interactive features of our Services,
- request customer support.

If we enable our users to contact us by email with questions, comments or requests, the information collected from these email communications is used to reply to such questions, comments, or requests.

When you use our Services, we may also collect information related to your use of the Services and aggregate this with information about other users. This helps us improve our Services for you.

Depending on your relationship with us and how you choose to interact with our Services, we may collect the following categories and types of personal information from and about you:

- **Your Account Information.** You may be asked to provide your mobile phone number and we also ask for your email address and country of residence so that we can deliver our Services to you. If you do not provide us with this information, you may not be able to use our Services.
- **Customer Support And Other Communications.** When you contact us for customer support or otherwise communicate with us, you may provide us with information related to your use of our Services, including copies of your messages, any other information you deem helpful, and how to contact you (e.g., an email address). For example, you may send us an email with information relating to app performance or other issues.

Automatically Collected Information

Like other technology service providers, we receive technical information when you use our Services. We use various technologies to analyse how people use the

Services, to improve how our Services function, to save your log-in information for future sessions, and (subject to your consent where legally required) to serve you with advertisements that may interest you.

Examples of personal data we would process through such means include:

- **Usage And Log Information.** We collect information about your activity on our Services, like service-related, diagnostic, and performance information and these are stored solely to ensure that the Service functions of if, and to the extent, required by the applicable law (including, but not limited to GDPR). This may include information about your activity (such as how you use our Services, your Services settings, and the time, frequency, and duration of your activities and interactions, IP address, URLs of referring pages and log files). This also includes information about when you registered to use our Services; the features you use, whether you are online, or when you last used our Services.
- **Device And Connection Information.** We collect device and connection-specific information when you install, access, or use our Services. This may include information such as hardware model, operating system information, battery level, signal strength, app version, browser information, mobile network, connection information (including phone number, mobile operator, or ISP), language and time zone, IP address, and device operations information.
- **Location Information.** We collect and use precise location information from your device with your permission. There are certain settings relating to location-related information which you can find in your device settings or the in-app setting. Even if you do not use our location-related features, we may use IP addresses and other information like phone number area codes to estimate your general location (e.g., city and country). We may also use your location information for diagnostics and troubleshooting purposes.
- **Cookies and similar technologies.** We use cookies and various traffic tracking technologies such as web beacons and embedded scripts to monitor use of our Services. A cookie is a small piece of data (text file) that a website, when visited by a user, asks your browser to store on your device in order to remember information about you, such as your language preference or login

information. We use cookies to improve your experiences, understand how our Services are being used, and customize them. Additionally, we may use cookies to remember your choices, like your language preferences, to provide a safer experience, and otherwise to customize our Services for you.

How We Use Information

We use information we have (subject to choices you make and applicable law) to operate, provide, improve, understand, customize, support, and market our Services. Here is how:

- to provide, operate, maintain, improve, and promote our Services;
- to enable you to access and use the Services;
- to process and complete transactions, and send you related information, including purchase confirmations and invoices;
- to send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages;
- to send promotional communications, such as providing you with information about the Services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners;
- to monitor and analyse trends, usage, and activities in connection with our Services, and your use thereof, including for marketing or advertising purposes as appropriate;
- to investigate and prevent fraudulent transactions, unauthorized access to our Services, and other illegal activities;
- to personalize our Services, including by providing features or advertisements that match your interests and preferences; and/or
- for other purposes for which we obtain your consent.

As an example, timestamps of connections may be used to calculate peak times of service demand in order to plan the network capacity; to manage the number of concurrent active connections, and handle abuse; to troubleshoot our Services. Application events, such as auto-connection, crash reports or uninstall event, may be used by us to plan product development and analytics – we would look into things such as ‘how many users do we have’ or ‘are users uninstalling after our latest release?’ or ‘is the app crashing on a specific device?’

For personal data collected in the EU/EEA, the UK and other relevant jurisdictions, we will process personal data on the basis of our legitimate interest in undertaking the above business related activities where it is necessary for the adequate performance of any contract we may have with you or to comply with the law and/or on the basis of your clear and informed consent (as applicable).

Managing And Retaining Your Information

You may access the personal information we maintain about you that is collected from our Services, correct inaccuracies in such personal information, and have such personal information deleted. You may also object to our processing of your personal information collected from the use of the Services. Please note that you may not be able to benefit from all features of the Services if you request the deletion of your personal information or object to or withdraw your consent to such processing. If you would like to verify the personal information we have received from you or make corrections to it, you may contact us directly at dpo@vpnstart.net requests to access, change, or remove your personal information will be addressed within thirty (30) days.

We store information for as long as necessary for the purposes identified in this Privacy Policy, including to provide our Services or for other legitimate purposes, such as complying with legal obligations, enforcing, and preventing violations of our terms, or protecting or defending our rights, property, and users. The storage periods are determined on a case-by-case basis that depends on factors like the nature of the information, why it is collected and processed, relevant legal or operational retention needs, and legal obligations.

- ***European Privacy Rights***

If you are a resident of the EU, EEA, or UK, you have the following rights under the General Data Protection Regulation and relevant implementing legislation with respect to our processing of personal data about you:

1. Right to access and rectification. You can request access to the personal data about you that we hold. For personal data that is inaccurate or incomplete, you have a right to request that we correct or amend such data. If any automated

processing of personal data is based on your consent or a contract with you, you have a right to transfer or receive a copy of the personal data in a usable and portable format.

2. Right of erasure. Under certain circumstances, and subject to several exceptions, you have a right to request that we delete personal information about you.

3. Right to withdraw consent. If the processing of personal data is based on your consent, you can withdraw consent at any time for future processing.

4. Right to object. You can object to, or obtain a restriction of, the processing of personal data under certain circumstances.

You may make such requests by contacting us at the email address provided in this section.

- ***U.S. State Law Privacy Rights***

A number of U.S. state privacy laws require additional disclosure for residents of those states.

If you are a California resident and the processing of personal information about you is subject to the California Consumer Privacy Act (“CCPA”), or if your personal information is subject to other data privacy laws that provide for additional rights, you may have certain rights with respect to that information, including:

1. The right to know: You have a right to request that we disclose to your certain information regarding the personal information we have collected about you. You also have a right to request additional information about our collection, use, disclosure, or sales or sharing of such personal information. Note that we have provided much of this information in this Privacy Policy.

2. The right to request deletion: You have a right to request that we delete personal information under certain circumstances, subject to a number of exceptions.

3. The right to request correction: You have a right to request that we correct inaccurate personal information, under certain circumstances.

4. The right to access: You have a right to request a copy of the personal information that we collected in a portable format, under certain circumstances.

5. The right to opt-out: You have a right to opt-out from future “sales” or sharing of personal information.

Because we value your privacy, we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

Finally, under California law, you have a right to not be discriminated against for exercising these rights set out in the CCPA.

Security

We take reasonable steps to help protect and secure the information we collect and store about our users. We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. We also limit access to personal data and confidential information on our systems to only those employees with a specific need to access this information.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website or mobile application.

Updates To Our Policy

We may change this Policy from time to time. Your use of our Services after the posting of such changes constitutes your consent to such changes. We encourage you to review our Policy whenever you use or access the Services to stay informed

about our information privacy practices and the ways you can help protect your privacy.

Children's Privacy

Our Services are not intended for children under 13 years of age. No one under age 13 may provide any information to or on our Services. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information to our Services or provide any information about yourself to us. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us.

Contact Us

If you have questions or issues about our Privacy Policy, please contact us at dpo@vpnstart.net