

# **Privacy Policy**

S.A.M. DEFCOM (hereinafter referred to as the "Company", "We" and "us", "by us"), the owner of DefTalk Application for mobile devices, available on the application's website www.deftalk.com (hereinafter referred to the Website) is deeply committed to observing your confidentiality.

This Policy determines how we obtain, collect and use information on our website www.defcom.com (the Website or Our Website), in our software DefTalk Application and other products and services provided on the website www.deftalk.com (all of the above together referred to as the Services).

- 1. By visiting this Website or using the Services, you accept rules and conditions described in this Policy, which could be changed over time. Every time, when you visit the Website or use the Services you express your direct consent to us collecting, using and disclosing information provided by you in accordance with the procedure described in this Policy.
  - 1.1. During installation of DefTalk Application you will need to provide us with your phone number and allow us to access the address book on your device.
  - 1.2. Your phone number will be used for the purposes of your identification as DefTalk application user.
- 2. We do not collect, register or process any of the following general categories of information:
  - 2.1. Information about your visits to our website, your use of the website;
  - 2.2. Geographical location;
  - 2.3. Operating system;
  - 2.4. Browser type;
  - 2.5. Information source;
  - 2.6. Visit duration;
  - 2.7. Number of pages viewed;
  - 2.8. Pages requested by your browser from our server (via cookies).
- 3. Our server processes the following specialized information while you are using the Website:
  - 3.1. Your IP address is processed for the purpose of demonstration the language version of the Website corresponding to the language of your country. In case if at the moment of using the Website, the language version corresponding to the country of your IP-address is not available, you will see the version of the Website in English.

Data about your IP address is processed by our server exclusively during the time of your visit of our website. We do not register, do not process for any purpose, other than the above, or do not store any data about your IP-address.





- 4. We register and process the following general information provided by you while communicating with us via the feedback form on our Website with the purpose of responding to your requests:
  - 4.1. Name;
  - 4.2. E-mail;
  - 4.3. The contents of your message addressed to us.

After we provide you with the reply to your request, the data specified in clauses 4.1.-4.3. is permanently deleted. Should you wish to contact us again via the feedback form, you will have to specify your data again.

- 5. . We register, process and store your personal data that you provide to us while subscribing to our Services (mobile application DefTalk), as well as the data that you indicate while using the Service and which is available for our processing for the following purposes:
  - 5.1. Only for the purposes specified when receiving such data;
  - 5.2. Only to support the functioning of the service in which you enter such data, for use;
  - 5.3. We store your data only during your usage of the Service. We reserve the right to permanently remove your data from our servers in case of inactivity of the Service use during one year.
  - 5.4. You have a possibility to change all and any of your personal data directly in DefTalk messenger. Please, note that if this is the case, the outdated data will be removed automatically, immediately and permanently from our servers.
  - 5.5. Should you wish to remove your personal data that you provided to us for the purpose of using our Service, you just need to delete DefTalk application from your device. The data will be removed automatically, immediately and permanently.
- 6. General personal data used by DefTalk application includes the following:
  - 6.1 Photo

If you provide your photo in the DefTalk mobile application, they will be visible to other users for as long as:

- Such users have your number linked to DefTalk, or
- You are members of one and the same group.
- 6.2 Online status and Seen status

Other users will see your connection status (online, offline, last seen) and whether you have seen the messages that were sent to you.

- 6.3 If you choose to use the option of sending your geo position to your contacts via the Application, this data will be processed by your mobile device and transmitted through our servers in encrypted form. Under no circumstances we register, process or store this category of data.
- 7. Distribution and disclosure of information





We do not transfer, sell or distribute information about our Users to third parties. However, we reserve the right to disclose personal User information subject to lawful demands or if we are bound by a court decision.

### 8. The principles of your data privacy in our system are as follows:

- 8.1. Our Software is designed in such a way that we have no technical capacity to decrypt data transferred by you via our Software.
- 8.2. The Company is not responsible for and does not participate in legal proceedings concerning requirements to decrypt data transferred by the User. Only the User who owns the information transferred possesses the technical capacity to decrypt any information transferred to them via the Company's Software.

## 9. We protect your information in the following way:

- 9.1. We take all possible steps to ensure the safety of your information, which is required for functioning of the Application, on our secure servers;
- 9.2. We store the following types of encrypted data using encryption keys known only to you:
  - we temporarily store on the servers information transferred by users in encrypted form for the purpose of ensuring its delivery to the user, who at the moment cannot receive it (if the user does not have internet connection). Upon receipt by the recipient the information is deleted from our servers.
  - data that you synchronize between your devices in the course of using the website and Software provided by the Company.
- 9.3. You bear responsibility for observing the privacy of your passwords and safety of your encryption keys stored on your device.

#### 10. Third party websites:

10.1. Our website may, from time to time, contain links to and from the websites. If you follow any links to a third party website, keep in mind that these sites have their own privacy policies and that we do not assume any responsibility or obligations under such policies. Please examine these policies prior to transferring any personal data to other websites.

#### 11. Access to information:

11.1. Our website does not possess the capability to access your personal information on your personal computer.

#### 12. Our relations with advertisers:

- 12.1. We do not disclose your data to our advertisers, however, We are entitled to provide summarized information about our users for the purpose of demonstrating to advertisers the characteristics of the target audience.
- 12.2. We are also entitled to use summarized information to provide assistance to advertisers in attracting the target audience.
- 12.3. If you have agreed to receive advertisements by email, internal email or via SMS from us or our partners, you can unsubscribe at any time by sending us an email via the Website of the Company or software developed by the Company.

## 13. Changes to our Privacy Policy:

13.1. We may revise this Privacy Policy from time to time. We reserve the right to update or change this Privacy Policy or any other policies or procedures at any time with or without





prior notice. However, we will not use your Personal information in any way that would substantially differ from the one described in this Policy without providing you with a possibility to exclude such use. We will publish revised Policy on the Website to provide users with the possibility to see what kinds of information we collect, how it is used and under which circumstances it can be disclosed. You agree to re-read the policy from time to time to stay updated. Your further use of DefTalk Application and Website www.defcom.com shall be viewed as your consent to any changes and conditions of our Policy. If you do not agree to these conditions, you should not use the Website www.deftalk.com, DefTalk Application or any other Service.

