# **PRIVACY POLICY**

Updated at March 2nd, 2024

### **GENERAL**

Money Mate ("we," "our," or "us") is committed to protecting your privacy. This Privacy Policy explains how your personal information is collected, used, and disclosed by Money Mate.

This Privacy Policy applies to our app, and its associated subdomains (collectively, our "Service") alongside our application, Money Mate. By accessing or using our Service, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy.

# LIMIT COLLECTION AND USAGE OF YOUR PERSONAL INFORMATION

We stick to the principle of restricting the collection and usage of your personal information. If you are using Money Mate only as a client without server synchronisation, we can't associate you with any person, and we don't gather users' names, addresses or social network details. In short, we don't have any information that could identify you as an individual. And we don't have any access to your in-app data before you synchronise your data on the server. Thus, when using server synchronisation, we do need to associate your data with a specific email address. We can't avoid this since we need to provide you with the ability to restore data should you lose the local one. We will never make your email address available to third parties not bound by this policy. But all the same, please bear in mind your preferred level of confidentiality when using the server synchronisation.

However, in order to provide better user experience we use external analytics services (Firebase, Google Analytics) that collect certain information about every user, such as date and time of usage, cookies, IP address, country, city, device language, phone OS and model, and mobile carrier.

While using Money Mate you are providing the following personal information: names and balance of your wallets and accounts, names and budgets of your income sources, expense categories, operations containing sum, accounts, income source or expense category, date of transaction and notes.

If you are using Money Mate within the EU and provide us your email address you will be required to express clear consent with the Privacy Policy and grant us a right to collect and store your personal information. You can refuse to do that but unfortunately you won't be able to use some functionality as synchronisation on the server.

# **CONTROL YOUR PERSONAL SECURITY**

Since an email address is the only link between the abstract set of data and your personality, we highly recommend you use an email address that is NOT associated with your social networks accounts or your name and surname. If you decide to use your primary email address, please maintain confidentiality of this email address, your password and the fact that it is associated with a Money Mate account. Under no circumstances should you provide your credentials to any third-party. We can't be held responsible if someone else accesses your server profile through registration credentials obtained from you.

You may choose not to provide your email address and still use all the local features that Money Mate provides including premium features, but excluding synchronisation with server and between different devices (since email is a unique identifier for this synchronisation).

#### **HOW DO WE PROCESS YOUR PERSONAL INFORMATION?**

We process your information for a variety of reasons, depending on how you interact with our Services, including:

- To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services
- To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention
- To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

# WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

**Consent**. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

**Legitimate Interests**. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

- Analyse how our Services are used so we can improve them to engage and retain users
- Diagnose problems and/or prevent fraudulent activities
- Understand how our users use our products and services so we can improve user experience

**Legal Obligations**. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

**Vital Interests**. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met

- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

# WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents (third parties) who perform services for us or on our behalf and require access to such information to do that work. We have agreements in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Advertising, Direct Marketing, and Lead Generation: <u>AdMob</u>, <u>AppLovin</u>
- Cloud Computing and Infrastructure Services: <u>Firebase Firestore</u>, <u>Firebase</u>
  Storage
- Performance Monitoring Tools: Firebase Crashlytics
- User Account Registration & Authentication Services: <u>Firebase Authentication</u>, Google Sign-In
- Testing Tools: Firebase Remote Config

We also may need to share your personal information in the following situations:

 Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

# **HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

Our Services offer you the ability to log in using your third-party social media account details (like Google login). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

#### HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

# DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at <a href="moneymate.dev@gmail.com">moneymate.dev@gmail.com</a>.

# WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right to request access and obtain a copy of your personal information, to request rectification or erasure; to restrict the processing of your personal information; and if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your <u>Member State data protection authority</u> or <u>UK data protection authority</u>.

If you are located in Switzerland, you may contact the <u>Federal Data Protection and</u> <u>Information Commissioner</u>.

**Withdrawing your consent**: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section **"HOW CAN YOU CONTACT US ABOUT THIS NOTICE?"** below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have questions or comments about your privacy rights, you may email us at moneymate.dev@gmail.com.

#### DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

#### **UPDATES ON PRIVACY POLICY**

We may update this privacy notice from time to time. The updated version will be indicated by an updated date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

#### **HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may email us at moneymate.dev@gmail.com.