

## **Mirror PRIVACY POLICY**

Last Updated June 22, 2018

AppManage Group #1, LLC (“**Company**“, “**we**“, “**our**” or “**us**”), acting under the Google Play alias MMAApps, understands the importance of protecting your privacy. This Privacy Policy explains what information of yours will be collected when you download, install, register with, access, or use this mobile application (the “**App**”), and how such information will be used and shared. It also explains choices you have to control the collection, correction and/or deletion of such information.

This policy applies only to information we collect in our App and in e-mail, text and other electronic communications sent through or in connection with our App. This policy DOES NOT apply to information collected in other apps or websites (including third party websites you may access through the App), or information collected by any third party. These third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Should you not wish to have your information gathered or used as described in this policy, you may uninstall the App from the device(s) on which you have downloaded it.

### **MEMBERSHIP IN SELF-REGULATORY FRAMEWORKS**

We are members of the Digital Advertising Alliance (DAA) (<http://www.aboutads.info/>), European Digital Advertising Alliance (<http://www.edaa.eu/>) and Japan Interactive Advertising Association (JIAA) (<http://www.jiaa.org/>). Therefore, we adhere to the cross-industry [Self-Regulatory Principles for Online Behavioral Advertising](#), the [IAB Europe EU Framework for Online Behavioral Advertising](#), and [JIAA Behavioral Targeting Advertising Guidelines](#).

### **INFORMATION WE COLLECT**

Information is automatically collected when you use our App. Information collected may include usage details, metadata, and real-time information about the location of your device. We do not generally collect or store information by which we ourselves may personally identify you (“**Personally Identifiable Information**” or “**PII**”) through the App. Any data is held by service providers and co-operation partners only, which are outlined below. Please note, however, that the information we have about you might still qualify as “personal data” under the GDPR.

### **HOW WE USE YOUR INFORMATION**

We use the information collected through the App to operate, maintain, and provide to you the features and functionality of the App; to diagnose or fix technology problems; to help you efficiently access your information after you sign in; to fulfill the purpose for which you provide it; to communicate with you regarding the App installed on your mobile device (e.g., to notify you when App updates are available); to protect our and your rights related to your use of the App; to carry out and enforce any contract entered into between you and us; and to comply with any court order, law, or legal process. We may also use information that we cannot use to identify you personally in order to optimize and to improve our services; to provide custom, personalized content in the App; to display targeted advertisements; for any other purpose disclosed by us when you provide the information or to protect the rights, property, or safety of the Company, our customers or others.

We do not store any PII on our own IT-systems. Please refer to the Data Protection Policies of the Service Providers referred to below.

### **HOW WE SHARE YOUR INFORMATION**

The Company may use and disclose aggregated, or otherwise anonymized information that does not relate to an identifiable natural person without restriction. For example, we may share anonymous usage data with third party

analytics providers to help them and us understand the usage patterns for the App and so that we can better consider new features or enhance our services.

### THIRD PARTY INFORMATION COLLECTION AND USE FOR ONLINE BEHAVIORAL ADVERTISING

When you use the App on an Apple or Android mobile device, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include advertisers, ad networks, ad servers, and analytics companies.

The Company provides the advertising ID generated by the Apple or Android mobile device (which is a non-persistent identifier of your device that you can reset at any time) and may also provide real-time location data, usage data, or other information related to your use of the App and other services via your mobile device (but will not provide your name, or your email address,) to these third-party ad servers or ad networks (“Advertisers”). Advertisers may also use tracking technologies to collect information about you when you use the App. Advertisers may collect information about online activities over time and across different websites, apps and other online services websites under a specific advertising ID. Advertisers may use this information (including the information we provide to them) to provide interest-based (behavioral) advertising or other targeted content to your mobile device.

The App includes the use of the following services:

Service	Contractual partner	Services	Privacy Policy
Google	Google LLC, USA	<ul style="list-style-type: none"> <li>• Google Analytics</li> <li>• Google Analytics for Firebase</li> <li>• Google Tag Manager</li> <li>• Google AdMob</li> </ul>	GA – <a href="https://policies.google.com/technologies/partner-sites">https://policies.google.com/technologies/partner-sites</a> Firebase – <a href="https://firebase.google.com/support/privacy">https://firebase.google.com/support/privacy</a>
AdColony	AdColony, Inc. (f.k.a. Opera Mediaworks Inc.) and its associated business units		<a href="https://www.adcolony.com/privacy-policy/">https://www.adcolony.com/privacy-policy/</a>
Amazon	A9.com, Inc., USA and Amazon Europe Core S.a r.l., Luxembourg and Affiliates		<a href="https://www.amazon.co.uk/gp/help/customer/display.html?nodeId=20199010">https://www.amazon.co.uk/gp/help/customer/display.html?nodeId=20199010</a>
Facebook	Facebook, Inc. USA and Facebook Ireland Limited	Facebook Audience Network	<a href="https://www.facebook.com/about/privacy/update">https://www.facebook.com/about/privacy/update</a>
Matomy	MobFox	Measurement/ personalisation of ads	<a href="https://www.mobfox.com/privacy-policy/">https://www.mobfox.com/privacy-policy/</a>
MoPub Inc.	Twitter Inc. and Affiliates	Measurement/ personalization of ads	<a href="https://www.mopub.com/legal/privacy/">https://www.mopub.com/legal/privacy/</a>
One by AOL	Oath (EMEA) Ltd., a company incorporated under the laws of Ireland (registration number: 426324) whose principal	Measurement/ personalization of ads	<a href="https://policies.oath.com/xw/en/oath/privacy/intl/index.html">https://policies.oath.com/xw/en/oath/privacy/intl/index.html</a>

	place of business is at 5-7 Point Square, North Wall Quay, Dublin 1, Ireland, on behalf of itself and Oath Affiliates		
Rubicon	The Rubicon Project, Inc., CA, USA	Measurement/ personalization of ads	<a href="http://rubiconproject.com/rubicon-project-yield-optimization-privacy-policy/">http://rubiconproject.com/rubicon-project-yield-optimization-privacy-policy/</a>


We do not control all of the Advertisers’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should consult the respective privacy policies of the Advertisers. This Company privacy policy does not apply to the Advertisers further mentioned. For information about how you can opt out of receiving targeted advertising, see “Choices About Your Information” below.

### HOW WE PROTECT YOUR INFORMATION

The Company uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your data. Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

### CHOICES ABOUT YOUR INFORMATION

We strive to provide you with choices regarding the information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

- Advertising IDs.** An advertising ID is a non-persistent, resettable identifier of your device that is used for purposes of online behavioral advertising. The advertising ID associated with your device is created and managed by Apple or Google, depending on whether you have an iOS or Android device. You may object to the transfer of the aforementioned information at any given time with immediate, future effect by adjusting the settings on your mobile device to disable the Apple-Ad-Tracking via IFDA or to opt out of interest-based ads via the Google advertising ID. The mechanism for opting out of interest-based ads is different for each device, so please consult the user manual for your device’s operating system for specific instructions. Additionally or alternatively, you can reset your advertising ID at any time (and as frequently as you would like), which causes Google’s or Apple’s system to build your device’s profile for advertising purposes anew, so that advertisers cannot link your activities taking place prior to the reset to your device.
- Other Tracking Technologies.** Depending on your device, you may be able to adjust the settings of your device to disable or refuse app cookies and/or other tracking technologies. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the App may then be inaccessible or not function properly. Please note that we do not access your device’s do-not-track settings, and we therefore do not respond to such settings. Third party advertisers, ad networks, and ad servers that display ads in our App may, however, access and respond to your device’s and browsers’ do-not-track signals; if you would like to know how a third party advertiser responds to do-not-track signals sent by your device or browser, please consult their privacy policy.
- Targeted Advertising by Third Parties.** We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In general, to find out more about how to opt out of receiving targeted ads from a particular advertiser click on the  AdChoices icon or link (or similar icon or link) appearing in or near the ad. You can also opt out of receiving targeted ads from members of certain ad networks as follows:

If the Advertiser is a member of or	To Opt Out
-------------------------------------	------------

<b>advertises through:</b>	
Digital Advertising Alliance	Install and use the <a href="#">AppChoices App</a>
European Interactive Digital Advertising Alliance	Opt out at <a href="http://www.youronlinechoices.eu/">http://www.youronlinechoices.eu/</a>
Google Ads	Learn how to opt out at <a href="#">Google Ads Help - Opt Out</a> .

You can stop all collection of information by the App by uninstalling the App. You may use the standard uninstall processes as may be available as part of your mobile device or via the App's marketplace or network.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [Mirror@mmappsmobile.com].

## **DATA SUBJECTS IN THE EU**

If you are located in the EU when using our services, the following information is relevant for you: To contact our Data Protection Officer, you may send an email to [feedback@digitalalchemy.us] with the subject ATTN: DPO. Through the use of SDKs, we allow our advertising partners in the US to collect non-PII data, which they store and use for targeting. The data recipients are regularly self-certified under the EU/US Privacy Shield (if located in the US) or may have agreed with us to apply the EU Model Clauses Controller to Controller or Controller to Processor. All three measures have been accepted by the European Commission under an Adequacy Decision as ensuring a sufficient level of data protection. The legal basis of the processing of the information is Art. 6 para 1 lit a) GDPR, your consent. You may withdraw your consent at any given time with future effect by following the withdrawal mechanisms described in the Privacy Policies of our partners, the Opt-Out procedures provided by the DAA, EIDAA and Google Adds described above, modifying the Settings in the app(s) you use or by uninstalling the app. You are not obliged to provide your information to us, neither by operation of law nor contract. If you do not provide consent to us, we will not be able to personalize your ads or measure your use of our services. You have the right to request access to and rectification or erasure of personal data and restriction of processing as well as a right to data portability and you may always lodge a complaint with a supervisory authority.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to modify this Privacy Policy in our sole discretion. If we change our Privacy Policy, we will make the updated privacy policy available from within the App. Changes to this Privacy Policy are effective when they are posted. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

## **CONTACT US**

If you have any questions or concerns about our Privacy Policy, please contact us at [Mirror@mmappsmobile.com].

Digitalalchemy LLC:  
15127 NE 24<sup>th</sup> Street  
Ste 132  
Redmond, WA 98052