

Privacy Policy

The Capture app service is built and provided by Numbers Co., Ltd.

This page is used to inform visitors regarding our policies with the collection, use, and disclosure of Personal Data if anyone decided to use our Service.

We respect your personal data and you (also referred to as the “User”) have full control and responsibility for all the data stored in your device. We will only collect the location data of the captured photos after confirming your consent. The uploaded data can be deleted per user request. You may withdraw your consent and, in that case, we will stop processing and erase the data impacted by your withdrawal. Note that we do not have access to the data stored on your device and you have to erase that data by yourself.

We may keep some of your Personal Data, like your email address, for operational or legal reasons but we never keep your health or location data. To clarify:

- we only keep the minimum data necessary for each purpose and we protect each piece of data by implementing technical, administrative and physical safeguards
- Other Personal Data, like your email address, may be accessed by other authorized persons for other purposes (*e.g.*, operation team considers a feedback sent by you), but they will not have access to the photos and metadata attached to it..

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions unless otherwise defined in this Privacy Policy.

This Privacy Policy covers the following topics:

Information Collection and Use

- 1. Third-party services and your data**
- 2. Data collected by Capture**
- 3. For which purposes does Capture use your information?**
- 4. How do we store your data?**
- 5. Do we transfer your information, why and how?**

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Information Collection and Use

1. Third-party services and your data

The app uses third party services that may collect information used to identify you. We have no responsibility over their policy. Please ensure that you agree with their terms too:

- [Google Play Services](#)

2. Data collected by Capture

When you use our Service, we do not actively collect nor process your health or location data. That data stay on your device until you decide to share it.

Nonetheless, we must collect a limited amount of Personal Data to perform essential activities necessary for operational or legal reasons. In those cases, we collect only the minimum data require and we process this data with care.

We may process the Personal Data with our employees, agents or authorized contractors as detailed in this privacy policy.

- **What information do you provide to us?**
 - Mandatory account information:
 - Email, Consent to our Terms and Conditions and Privacy Policy
 - Optional information
 - Information that you freely decide to send to us, such as a feedback
 - Location information such as GPS signals
- **What information do we receive from your use of the Service?**
 - Mandatory information
 - Usage information? (e.g., language, and operating system)
 - Optional information:
 - Information that you opt to send us, such as error reports

3. For which purposes does Capture use your information?

- **Perform Service**

Basic account information is required to maintain your account and manage contractual obligations arising from our Terms and Conditions.

- **Communicate with you**

When you contact us, we will need to use your email address, and other Personal Data that you freely share to us, to interact with you. If you consent to it, we may also send you updates about our organization or services.

- **Improve our Service**

We analyze Usage Data or your feedbacks to fix errors and bugs or improve our Service (*e.g.*, adapt User Interface, add new option)

- **Share your data with specified friends**

Only if we receive your explicit consent and request, we will help you transfer the ownership of the photos to your specific friends, the information such as when and where the photos were taken would also be shared..

- **Legal or safety purposes**

We may keep Personal Data, such as basic account information and other Personal Data to:

- i. comply with a legal obligations or in relation to legal claims or requests and be able to protect legal rights or defend against legal claims;
- ii. detect or prevent (a) threats to the safety of individuals and the security of the Service, (b) abuse, (c) fraud, (d) illegal activities or (e) a violation of our Terms and Conditions.

In principle, we will not store your health and location data for those purposes, except if we have a legal obligation to do so.

4. How do we store your data?

In order to create immutable birth certificates of photos, the metadata, such as capture time and location alone with the photos are collected by us and are stored in the AWS cloud storage.

For other Personal Data, the storage duration varies on the purpose:

- Perform Service: Storage as long as your account is in existence
- Communicate with you: Storage as long as account in existence and up to 36 months after last message from you
- Improve our Service: Storage up to 13 months as from collection date
- Personalize our Service
- Legal or safety purposes: Storage depends on legal obligations and related statutes of limitation.

5. Do we transfer or sell your information, why and how?

- We do not sell your Personal Data.
- Use of optional features of the Service

Optional features of the Service may require to share or transfer Personal Data. The information required to use this feature will be explicitly mentioned and you may agree to share that data.

- Transfer based on your directions.

If you direct us to transfer your Personal Data to a third-party, we may transfer your Personal Data as specifically requested. Consider this carefully as your information will be governed by their terms and conditions and privacy policy.

- External Processing

Your Personal Data may be transferred to our services providers, affiliates or other partners that help us operate or improve the Service. The processing of Personal Data will be performed based on our instructions, in compliance with this Privacy Policy and with appropriate safeguard measures in the interests of providing quality services to you.

- For legal or safety reasons, we may disclose information about you (on a need-to-know basis or legal obligation) to counsels, advisors, authorities or courts to fulfill legal obligations, preserve our rights or defend us against legal claims.

Your rights on your Personal Data

If you wish to exercise your rights listed below, we invite you to contact us at service@numbersprotocol.io or through your profile on Capture and we should answer you within 30 days.

You have the right (i) to access to your Personal Data processed by us, (ii) to request rectification of inaccurate data or (iii) to erasure of data (right to be forgotten), (iv) to restrict the processing, to export your data (data portability), (v) not to be subject to automated individual decision-making, or (vi) to object to the processing. We will promptly address the request and will provide details on your specific request.

European Privacy

If the General Data Protection Regulation (“GDPR”) applies to you (*i.e.*, we process your data on a territory where the GDPR is applied (European Economic Area, U.K., or Switzerland) or we process Personal Data to offer goods or services in such territories or monitor your behavior within those territories), the following sections apply:

1. Data controller and its representative in the European Union

You may contact our Data Protection Officer and our representative at service@numbersprotocol.io

a. Data controller

Numbers

Legal and Privacy Department

7F.-1, No. 429, Guangfu S. Rd., Xinyi Dist., Taipei City 110, Taiwan

2. Legal base to process your data

- a. **Perform Service:** performance of contract and/or to enter into a contract
- b. **Communicate with you / Improve our services:** legitimate interest to satisfy our users, provide quality services in the framework of Capture and improve these services.
- c. **Personalize our Service**
- d. **Share the captured photos with friends:** your explicit consent.
- e. **Legal or safety purposes:**
 - i. protect the vital interests of natural persons
 - ii. compliance with a legal obligation and legitimate interest to be able to defend our rights

3. Right to lodge a complaint to a data protection authority

You also have the right to lodge a complaint with the data protection authority based in your country.

Security

We value your trust in using our app to log your life activities, thus we are striving to use commercially acceptable means of protecting it, which combine technical, administrative and physical safeguards to maintain the security of your Personal Data. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Links to Other Sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. These external sites are not operated by us. Therefore, we advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

These Services do not address anyone under the age of 13. we do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us at service@numbersprotocol.io so that we will be able to do necessary actions.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you before any updates of the Privacy Policy for your review and decide whether you agree with the new Privacy Policy and wish to continue to use the Service. Previous versions of our Privacy Policy are available here.

This policy is effective as of 09 Nov 2020

Contact Us

If you have any questions or suggestions about our Privacy Policy, or wish to exercise one of your privacy rights, please contact us at service@numbersprotocol.io.