

Privacy Policy

[Last Revised: May 30, 2018]

FIXY NETWORK (FixyApp) Limited. (“we,” “us,” “our” or “FIXY NETWORK (FixyApp)”) is a mobile advertising and data company that provides its mobile application developers, advertisers and publishers (“Business Partners”) with an advertising platform for the purpose of delivering targeted and personalized advertising to individuals (“User(s)”) that download, use or otherwise interact with an App Developer’s app or our Services, as defined below (hereinafter the “Business Partners” and “User(s)”) shall be collectively defined as “you” or “yours”).

Our technology enables our Business Partners to show Users more relevant advertising that is based on Users’ interests and behaviors. In order to provide these Services, we collect and use certain information about Users’ activity and preferences, all as detailed in this Privacy Policy (“Policy”).

FIXY NETWORK (FixyApp) recognizes the importance of your privacy and we take this issue very seriously. To this end, we have designed the FIXY NETWORK (FixyApp) Privacy Policy in a format that is easy to read so that you can clearly understand our privacy practices. We are committed to treating any information we collect with care and respect. This Policy describes how FIXY NETWORK (FixyApp) collects, uses, shares and secures the data you provide or that it receives, as well as your choices regarding use, access and correction of personal information.

ACCEPTANCE OF THE TERMS: BY USING AN APP WITH OUR SDK OR THE OUR SERVICES, AS APPLICABLE, YOU HEREBY AGREE TO THE TERMS OF THIS PRIVACY POLICY AND TO THE COLLECTION AND USE OF CERTAIN DATA. ANY USE OR CONTINUED USE OF THE APP OR FIXY NETWORK (FixyApp) SERVICES CONSTITUTES YOUR AGREEMENT AND CONSENT TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THESE TERMS, PLEASE DO NOT ACCESS, DOWNLOAD OR USE THE APP OR SERVICES OR CONTACT US. This Policy describes FIXY NETWORK (FixyApp)’s collection and use of the information provided or collected on or through our various services and features (collectively shall be defined hereinafter as the “Services”):

- (i) our websites, which is currently available at <https://fixyapp.io> (“Site(s)”);
- (ii) the monetization platform for our Business Partners available at: <https://fixyapp.io>
- (iii) FIXY NETWORK (FixyApp)’s app developer partners’ (“App Developer”) that implement the FIXY NETWORK (FixyApp) Software Developer Kit (“SDK”) within their mobile app (“app(s)”) for the purpose of displaying advertisement. This Policy is an integrated part of the FIXY NETWORK (FixyApp)’s the Publisher Agreement <https://fixyapp.io> as well as the Advertising Agreement <https://fixyapp.io> which is a legally binding agreement between the Business Partner and the FIXY NETWORK (FixyApp).

If you have any questions about this Policy or our privacy practices, please do not hesitate to ht@fixyapp.io.

1. TYPES OF INFORMATION WE COLLECT

The first type of information is non-identifiable information which may be made available or gathered via your use of the app or the Services (“Non-Personal Information”). We are not aware of the identity of the User or Business Partner from which the Non-Personal Information was collected.

The Non-Personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including: (i) certain software and hardware information (i.e., type of device); (ii) the session ID, the time and date you access the mobile app or our Site, connect or disconnect to the Services, etc.; and (iii) browsing data such as: browser type, visited URL, etc.

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“Personal Information”). Personal Information includes either (i) your email address and private password submitted upon registration and contact information such as your name, telephone number, address upon a submitting voluntarily request to contact us; or (ii) certain identifiers such your IP addresses or Android ID, Advertising ID, IDFA or Device ID (“IDs”) . Note that, while IDs are not considered personally identifiable information in some jurisdictions, there are jurisdictions (such as the EU), in which such data sets are considered “Personal Data”. Therefore, we treat all IDs from various jurisdictions as “Personal Data”.

Please note that we may collect different categories of Personal and Non-Personal information from you depending on the nature of your interaction with the Services, as detailed below. However, we will always treat Non-Personal Information as Personal information if we combine it with such.

We may also collect, from you, someone else’s Personal Information, such as an email address, if you choose to do so through our Refer a Friend option available here <https://www.fixyapp.io> we will only use this information for the specific reason for which it is provided.

- INFORMATION WE COLLECT FROM BUSINESS PARTNERS

If you are one of our Business Partners, we may collect the following information from you:

- Registration: this information is provided when you create a FIXY NETWORK (FixyApp) account. For example, in order to register to the Services, we require basic contact information such as: first and last name, email address and company name, company address, etc. Further, during the registration process the Business Partners will be required to create a username and password, at which time you thereby represent and warrant that you are responsible for maintaining the confidentiality of your username and password. You represent and warrant that you will not provide inaccurate, misleading or false information to FIXY NETWORK (FixyApp). If information provided to FIXY NETWORK (FixyApp) subsequently becomes inaccurate, not updated, misleading or false, you will promptly notify FIXY NETWORK (FixyApp) of such change.

- **Payment:**In order to transfer payment, you will be required to fill in your payment details, such as: bank or financial account information, credit card or debit card numbers, PayPal account, etc.
- **Technical:** we also collect viewing and usage information that relates to your interaction with the Site, such as your IP address, the amount of time you spend viewing certain portions of the Site, etc.
- **Newsletter Subscription:**If you voluntarily subscribe to our Newsletter you will be asked to provide us with your email address, you can unsubscribe at any moment through your account or by clicking unsubscribe.

- **INFORMATION WE COLLECT FROM USERS**

The FIXY NETWORK (FixyApp)'s SDK, which is integrated into various mobile apps, is a piece of software that allows our Business Partners to provide you with personalized content, including advertisements. By downloading and using the app, Users grant the App Developer with permission to collect such device information and share it with FIXY NETWORK (FixyApp) pursuant to the acceptance of the App Developer's privacy policy.

FIXY NETWORK (FixyApp) may track this information over time in order to profile you and deliver targeted advertisements through the Service. This information includes non-personal and personal information related to your device and your use of the app (collectively referred to as "Device Information"), such as:

- Non-real time GPS location, points of interest or other not precise geolocation data;
- Bluetooth devices and your device's sensors such as the accelerometer, etc.;
- Carrier, ISPs;
- Log Files;
- Device properties such as: operating system, operating system version, device type;
- Name of the mobile application through which a User interacts with the Services;
- Language settings;
- Network connection details and WiFi data;
- A query of your installed applications; and
- IDs (as detailed and defined above).

2. USE OF YOUR INFORMATION BY FIXY NETWORK (FixyApp)

FIXY NETWORK (FixyApp) uses the information it collects about you to provide the Services and to gain a better understanding of the products and services that may interest you and other Users. We may use your information in order to:

- Operate, manage and improve the Services;
- Respond to your inquiries;
- Provide you with requested services;
- Protect the rights or property of FIXY NETWORK (FixyApp) or third parties;
- Deliver targeted advertisements on behalf of our Business Partners, i.e., to profile your behavior and interests (note: you may opt-out of receiving such targeted advertisements as set forth below at any time); and
- Detect fraud in connection with the Services.

3. HOW WE COLLECT INFORMATION

Depending on the nature of your interaction with the Services, FIXY NETWORK (FixyApp) may collect information from you automatically when you use the app or Service, or when you voluntarily choose to provide us with information, all as detailed in this Policy. We may also acquire information from other trusted sources to update or supplement the information that you voluntarily provide to us or that we collect automatically. Whenever technically possible, we will ask for your consent to collect your Personal Information and always offer you the choice to opt-out.

If you are a visitor to the Site or a Business Partner, we collect information that you voluntarily provide us during your interaction with the Services solely for the purpose of providing the Services.

We may also collect certain types of information automatically, including through the use of Cookies, Web Beacons and other similar tracking technologies (as detailed below). These tracking technologies allow FIXY NETWORK (FixyApp) to personalize your experience with the Services (e.g., remember your password when you login).

FIXY NETWORK (FixyApp) primarily collects information from Users when an App Developer serves an advertisement to a User by using the FIXY NETWORK (FixyApp) SDK, as detailed above. By downloading and using an App Developer's mobile app, you have the opportunity to grant the App Developer with permission to collect Device Information and share it with FIXY NETWORK (FixyApp).

For additional information regarding choices you may have with respect to our use of your information, please refer to the Your Choices and Controls section of the Policy.

4. DATA COLLECTION BY THIRD PARTY

When you access or use the Site, we may use industry-wide technologies such as "cookies" (or similar technologies), which store certain information on your device (i.e., locally stored) and which will allow us to customize the Service and content as well as enhance your experience of the Services.

The cookies and similar technologies used by us are created per session and do not include any Personal Information, other than your preference, navigation on the applicable app as well as the session key and allow us to analyze trends, track users' movements around the Site, which are removed as your session ends. Most browsers will allow you to erase cookies from your device, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your experience may be limited.

Third parties (i.e., Google Analytics) may also use cookies, scripts or web beacons for the purpose of tracking and analyzing your use, this information does not include Personal Information. To learn more about how Google uses data from our use of Google Analytics Cookies, we recommend you review Google's policies located at: www.google.com/policies/privacy/partners. We also encourage you to review the Google Analytics' currently available opt-outs for the web tool available at: <https://tools.google.com/dlpage/gaoptout/>

5. THIRD PARTY CONTENT

The Services may link to third party non-FIXY NETWORK (FixyApp) websites and apps or other third party content ("Third Party content"). The Third Party Content is not reviewed or examined by us. FIXY NETWORK (FixyApp) cannot control the content or treatment of your information by such third parties, and the privacy practices of third parties likely differ from those described in this Policy. We encourage you to carefully read the privacy policies and terms of use of those third parties.

FIXY NETWORK (FixyApp) is not responsible for the content of any Third Party Content, or any additional links contained therein nor for the quality or accuracy, timeliness, completeness, safety or adequacy, fitness for a particular purpose of any content of any such Third Party Content. The offering of these features does not imply FIXY NETWORK (FixyApp)'s endorsement of, or association with the Third Party Content. We make best efforts to ensure the Third Party Content will not harm your experience, however we cannot represent or warrant to such Third Party Content. It is your sole responsibility to comply with the appropriate terms and conditions of the Third Parties Content as well as with any other obligation under copyright, secrecy, defamation, decency, privacy, security and export laws related to the use of such Third Party Content and any content contained thereon. In no event shall the FIXY NETWORK (FixyApp) be liable to anyone for any damage arising from or occasioned by the creation or use of the Third Party Content or the information or material accessed-through these Third Party Content. FIXY NETWORK (FixyApp) may at its sole discretion add, change, decline or remove, without notice, any feature or link to any of the Third Party Content from the Service or site.

6. SHARING YOUR INFORMATION WITH OTHER COMPANIES

StratApp will not share any Personal Information collected from you with third parties or any of our partners except in the following events:

- (i) Authorized Disclosures. We may disclose your Personal Information to third parties when you consent to a particular disclosure of your Personal Information. Please note that once we share your information with another company, that information becomes subject to the other company's privacy practices.
- (ii) Compelled Disclosures. We will share your information, solely to the extent needed to comply with any applicable law or permitted by it, regulation, legal process or governmental request (e.g., pursuant to law enforcement inquiries, subpoenas or court orders), or when we believe, in good faith, it is required in order to enforce our policies (including our policies and agreements) including investigations of potential violations thereof or to detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues. In addition, we will share your information, solely to the extent needed to establish or exercise our rights to defend against legal claims or to prevent harm to the rights, property or safety of us, our users, yourself or any third party or for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.
- (iii) Service Providers. We may disclose Personal Information to our service providers so that they can perform requested services on our behalf. These entities are prohibited from using your personal information for any purposes other than providing StratApp with requested services.
- (iv) Business Transfers. We may share Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy.
- (v) Identifiers. We may share IDs collected by us (as detailed above), for the purpose of operating our business and providing the Services, as well as to calculate payments and detect fraud, security or technical issues in connection with the Services.
- (vi) Third Party Partners. We may share Personal Information with our Third-Party Partners, as follows:
Oracle Corporation – for more information regarding Oracle privacy practices, please see its privacy policy available at: <https://www.oracle.com/legal/privacy/index.html>.
LiveRamp (Acxiom Corporation) – for more information regarding Oracle privacy practices, please see its privacy policy available at: <https://liveramp.com/privacy/>.
- (vii) Non-Personal Information. We may share aggregate or Non-Personal Information with Business Partners and other third parties in accordance with the terms of this Policy. We may store Non-Personal and Personal Information on our servers or our cloud servers, use or share Non-Personal Information in any of the above circumstances, as well as for the purpose of providing and improving our App and Service, aggregate statistics, marketing and conduct business and marketing analysis, and enhance your experience with the App.

FURTHERMORE, WE RESERVE THE RIGHT TO USE, DISCLOSE OR TRANSFER (FOR BUSINESS PURPOSES OR OTHERWISE) AGGREGATED AND PROCESSED DATA TO THIRD PARTIES, INCLUDING, INTER ALIA, AFFILIATES AND CONSULTANTS, FOR VARIOUS PURPOSES INCLUDING COMMERCIAL USE. THIS INFORMATION MAY BE COLLECTED, PROCESSED AND ANALYZED BY THE FIXY NETWORK (FixyApp) AND TRANSFERRED IN A COMBINED, COLLECTIVELY AND AGGREGATED MANNER (I.E., YOUR INFORMATION IS IMMEDIATELY AGGREGATED WITH OTHER USERS) TO THIRD PARTIES.

7. YOUR CHOICES AND CONTROLS

FIXY NETWORK (FixyApp) provides you with the ability to exercise certain choices and controls in connection with our treatment of your information. Depending on your relationship with FIXY NETWORK (FixyApp) (e.g., if you are a User or

Business Partner), data protection and privacy laws provide you with the right to correct, modify, update or delete the Personal Information we collect on you as well as object to the collection or opt-out of the targeting advertising. Please note this does not mean you will not receive advertisements. This solely provides you with the choice to receive advertisements that are not targeted to you and to control the data collected on you for the purpose of displaying advertisements.

Subject to the applicability of specific legislation you have the right to: access your Personal Information that we hold; request the rectification of your Personal Information that we hold; request the erasure of your Personal Information that we hold; request to restrict processing of your Personal Information; object to processing of your Personal Information by us; request to transfer your Personal Information that we hold (i.e., data portability); file a complaint to a supervisory authority in your jurisdiction; and a right to withdraw consent. Note, Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

In the event you make such request, note that we may require certain information from you in order to verify your identity and locate your data which may take up until one (1) month, all in accordance with applicable privacy laws.

If you would like additional information about the choices and controls that may be available to you, or you would like to access your Personal Information, please ht@fixyapp.io or contact our Data Protection Officer (“DPO”) at:

1. OPT OUT RIGHT

Even after providing your consent to this Policy, you are entitled to change your mind. If you do, you may easily opt out of the data collection, sharing process and targeted advertising services related to our Service. Please note that even if you opt-out, you may still receive content and advertising from FIXY NETWORK (FixyApp). Opting-out just means that the advertisements you do receive from us will not be targeted in any sort of way.

Please read your device specific information to learn how to opt-out:

Android-<https://support.google.com/ads/answer/2662922>

iOS-<https://support.apple.com/en-il/HT205223>.

You may also ht@fixyapp.io and we will be happy to assist you. Note that once you opt out, part of the Services provided by us might no longer be available and some features may not work if you revoke the data transfer.

Additional means to opt out, depending on your device are available, such as:

- You may control how your browser responds to cookies by adjusting the privacy and security settings of your web browser.
- You may limit the disclosure of certain Non-Personal Information by your mobile device to us and our Business Partners by adjusting the settings on your mobile device. For iOS mobile Devices, go to “Settings” from your Device’s home screen; scroll down to “Privacy”; select “Advertising”; and turn on “Limit Ad Tracking.” For Android mobile Devices, go to “Google Settings” on your Device; select “Ads”; and check the box labeled “Opt Out of Interest-Based Ads.”
- You may opt out of certain advertisers’ cookies and browser-enabled, interest-based advertising at the Network Advertising Initiative’s (“NAI”) website-[NAI consumer opt-out](#) and the Digital Advertising Alliance’s (“DAA”) website- [DAA opt-out page](#).
- If you wish to opt out of interest-based advertising, you may also click [here](#), or if located in the European Union click [here](#). Please note you will continue to receive generic ads.
- Our Business Partners may also provide ways for you to opt out from or limit their collection of information from and about you. Please refer to the privacy policies for the Apps to learn more about the privacy practices of our Business Partners. Please note, however, that we are not responsible for the privacy practices of Our Business Partners, and other third parties.

1. CHILDREN’S PRIVACY

In the event you are our Business Partner, you represent and warrant that you are at least 18 years of age; and you are of legal competence to enter into this Privacy Policy.

FIXY NETWORK (FixyApp) complies with applicable legislation related to children’s privacy protection, including the US Children’s Online Privacy Protection Act (“COPPA”). Thus, we do not knowingly collect or solicit Personal Information from children, as they are defined under applicable law, and specifically: under the age of 18 years old, if they are located in the US; (ii) under the age of 18 years old, if they are located in the EU; (collectively: “child” or “children”), except as permitted under applicable law. Notwithstanding the above, in any event, we will not knowingly collect Personal Information from children for the purpose of behavioral advertising.

If we later obtain actual knowledge that a User is considered as a child under applicable law, and Personal Information was collected (other than as permitted under applicable law) we will take steps to immediately delete its Personal Information.

In addition, we request that children will not voluntarily provide us with Personal Information through the Services.

If you become aware or have any reason to believe that a child has shared any Personal Information with us, please ht@fixyapp.io and we will take steps to ensure that such Personal Information is immediately deleted from our files, to the extent required under applicable law.

1. DATA SECURITY, INTEGRITY AND RETENTION

Your privacy is very important to FIXY NETWORK (FixyApp) and we are committed to protecting your Personal Information from unauthorized access, use or disclosure. We have implemented physical, technical and administrative security measures for the Services that comply with applicable laws and industry standards. For more information on our security measures, please click [here](#).

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will be able to prevent such access.

FIXY NETWORK (FixyApp) also protects User privacy by seeking to minimize the amount of data that we store on our servers in the first place. We retain the Non-Personal Information we collected for as long as needed to provide the Service, carry out our business purpose and to comply with our legal obligations, resolve disputes and enforce our agreements, in accordance and compliance with applicable laws, but in any event we will not keep the data longer than 24 months in an identifiable form, or as required by law. Other data, such as the IDs are kept for maximum time period of 6 months and some for less than 7 days, all as required to provide the Service and in compliance with applicable laws and legislation.

Further, in the event of a data breach, in which we discover your Personal Information is at risk, or might be at risk, we will notify you through the Services or, if technically possible, by sending you an email.

1. TRANSFER OF DATA

As a part of an international group, we may store or process your personal information in the United States or in other countries. If you are a resident of the European Economic Area (“EEA”) we will take appropriate measures to ensure that your personal data receives an adequate level of data protection upon its transfer outside of the EEA. If you are a resident of a jurisdiction where transfer of your personal data requires your consent, then your consent to this Privacy Policy includes your express consent for such transfer of your data.

1. DO NOT TRACK DISCLOSURE

The Service does not respond to Do Not Track signals. For more information about Do Not Track signals, please see <http://www.allaboutdnt.com/>.

1. CHANGES TO THE POLICY

We reserve the right to periodically amend or revise this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the Site. If we do make any changes, the updated date at the top of the Policy will be reflected in the “Last Revised” heading. If we make any material changes, that will substantially affect your use of the Service or the data collection by us, we will make best efforts to provide you with notifications by email (sent to the e-mail address specified in your account) or by means of a notice on this Site. We encourage you to review the Policy periodically to ensure that you understand how we collect, use and share information through the Services. Any changes to the Policy will become effective immediately upon the display of the revised Policy. Your continued use of the App or Services following the display of such revised Policy, constitutes your acknowledgement and consent of such amendments and your agreement to be bound by the terms therein.

1. CONTACT US

If you have any questions or comments about this Policy, please write to us at:
FIXY NETWORK (FixyApp) Limited.

You can also contact us via email at: ht@fixyapp.io.

1. DATA PROTECTION OFFICER

If you have any requests regarding the data collected under this Policy, including without limitation, requests to remove, delete, amend, modify or transfer the data, please contact our Data Protection Officer at:
ht@fixyapp.io

Please be sure to include your name, address and email address in any correspondence to us so that we can respond to your inquiry in a timely manner.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.