

# “FamiGuard” App - Privacy Policy

This Privacy Policy was last revised on 12/27/2019

FamiGuard understands the importance of protecting personal information. This privacy policy outlines how FamiGuard collects, uses, and discloses your personal information. You will also find information on how we protect your personal information.

## 1. What information do we collect?

**Account information:** When you register a FamiGuard account, we collect your user name and email address. We use this information for account identification and email communication about the account status.

**Device information:** When you install the FamiGuard mobile app to your mobile device, we collect device ID/name, OS version and model. We use this information for device identification.

**Location information:** When you run the FamiGuard mobile app in your device, we collect location data through GPS, Wi-Fi, or cellular triangulation. We use this information to provide location tracking service on our app. We maintain this data only so long as is reasonable to provide our service. Out-of-date data is removed from our database.

## 2. How do we protect your information?

We protect your data in your device. The FamiGuard mobile app collects location data from your tracked device. We encrypt your location data when transmitting from your device to our server. We then delete this data from your device once data transmission completes.

We protect your data online. Data access is protected by an account authentication process. Only account holder who knows the account credential can access to your own data in your account. Other users cannot access your data unless you have opted in location sharing.

We protect your data offline. Your account and location data are stored in our secured database. Only employee who needs the information to perform a specific

job is granted access. The server in which we store our database is hosted with Amazon Web Service in a secure environment.

### **3. Do we share your information to outside parties?**

We do not share your personal data with third parties, other than as necessary to fulfill our services. We do not sell your personal data to any third parties. We may be required to disclose an individual's personal data in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. For example, we may share information to respond to a court order, subpoena, or request from a law enforcement agency.

### **4. Privacy policy for EEA and Swiss users**

This Part of the Privacy Policy explains how FamiGuard collects, uses and discloses information that is collected through our service from users from the European Economic Area or Switzerland.

#### **4.1. Privacy Shield**

FamiGuard complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland transferred to the United States pursuant to Privacy Shield. FamiGuard has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov>.

#### **4.2. Collection and use of personal data**

See section 1. What information do we collect?

#### **4.3. Right to access, change or delete personal data**

You have the following rights in respect of your personal data that we collect:

Right of access: You have the right to access to your personal information that we collect.

Right of correct: You have the right to correct your personal information that we collect.

Right of delete: You have the right to delete your personal information that we collect.

By logging into your account on the FamiGuard app, you may view your location data, review and edit your contact and profile information. You can also contact us using the contact details at the end of this privacy policy to exercise one of these rights.

#### **4.4. Disclosures / onward transfers of personal data**

FamiGuard does not disclose your personal data with third parties, other than as necessary to fulfill our services. FamiGuard does not sell your personal data to any third parties.

FamiGuard may be required to disclose an individual's personal data in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

FamiGuard is liable for appropriate onward transfers of personal data to third parties.

FamiGuard does not disclose your personal data with third parties, other than as necessary to fulfill our services. Should this change in the future, FamiGuard will provide the option to opt-out.

#### **4.5. Enforcement and dispute resolution**

As part of our participation in the Privacy Shield, FamiGuard is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC).

In compliance with the Privacy Shield Principles, FamiGuard commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact FamiGuard at [support@nikmesoft.com](mailto:support@nikmesoft.com).

FamiGuard has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield

complaints concerning personal data transferred from the EU and Switzerland. You have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

## **5. Contact us**

If you have questions or concerns regarding this Privacy Policy, you should first email us at [support@nikmesoft.com](mailto:support@nikmesoft.com).

## **6. How often do we update privacy policy?**

We may modify this Privacy Policy from time to time. Please see the revised date at the top of this page to see when this Privacy Policy was last revised.