**AceFluency Privacy Policy**

**Last Updated: February 23, 2021**

AceFluency ("AceFluency", "we" and "us") respects the privacy of its users ("you") and thus we have developed this Privacy Policy to demonstrate our commitment to protecting your privacy. This Privacy Policy describes the information that we would collect, how that information may be used and with whom it may be shared. We encourage you to read this Privacy Policy carefully when using our application or services or transacting business with us. By using our website, application or other online services (our "Service"), you are accepting the practices described in this Privacy Policy.
Moreover, if you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

**INFORMATION WE COLLECT**

* **General:** We may collect Personal and other information. "Personal Information" means individually identifiable information that would allow us to determine the actual identity of, and contact, a specific living person. We may collect this information through a website, mobile application, or other online services. By using the Service, you are authorizing us to gather, parse and retain data related to the provision of the Service. When you provide personal information through our Service, the information may be sent to the servers located in the Singapore, United States or other countries around the world.
* **Information you provide:** In order to register as a user with AceFluency, you will be asked to sign in using your mobile number. In addition, we would collect other personal information such as your name, email address, age, gender, country / state, native language and medium of education. If you transact business with us, we would also collect some additional information, such as a billing address, a credit / debit card number and a credit / debit card expiration date and/ or other payment instrument details. You may also provide us with your photo by adding it as your profile pic in the account section. When you talk with other AceFluency users, audio files of your conversations are generated. AceFluency might record these conversations solely with the aim of improving your experience and giving additional services to you. You grant AceFluency an exclusive, transferable, sub-licensable, non-revocable, worldwide license to use recorded conversations to host, store, use, copy, display and process the Content.
* **Browsing Information:** We may track certain information about you based upon your use of our Service. We use this information to do internal research on our users' demographics, interests, and buying and browsing behaviour to better understand, protect and serve our users. This information may include the URL that you just came from (whether this URL is on our platform or not), the URL you go next to (whether this URL is on our platform or not), your computer browser information, your location, your mobile device, including a unique identifier for your device and your IP address. If you choose to buy on the platform, we collect information about your buying behaviour, preferences, and other such information that you choose to provide.
* **Cookies and use of cookie and similar data:** When you visit our Service, we may assign your device one or more cookies or other technologies that facilitate personalization to facilitate access to our Service and to personalize your experience. Through the use of a cookie, we also may automatically collect information about your activity on our Service, such as the pages you visit, the time and date of your visits and the links you click. If we advertise, we (or third parties) may use certain data collected on our Service to show you AceFluency advertisements on other sites or applications.
* **Pixel Tags:** We embed pixel tags on web pages, ads and our platform. These tiny, invisible graphics are used to access cookies and track user activities (such as how many times a page is viewed). We use pixel tags to measure the popularity of our features and services. Ad companies also use pixel tags to measure the number of ads displayed and their performance (such as how many people clicked on an ad).
* **Mobile device IDs:** If you're using our app, we might use mobile device IDs (the unique identifier assigned to a device by the manufacturer), or Advertising IDs (for iOS 6 and later), instead of cookies, to recognize you. We do this to store your preferences and track your use of our app. Unlike cookies, device IDs cannot be deleted, but Advertising IDs can be reset in "Settings" on your iPhone. Ad companies also use device IDs or Advertising IDs to track your use of the app, track the number of ads displayed, measure ad performance and display ads that are more relevant to you. Analytics companies use device IDs to track information about app usage.
* **Information collected by third-parties for advertising purposes:** We may allow service providers, advertising companies and other third parties to display advertisements on our Service and elsewhere. These companies may use tracking technologies, such as cookies or web beacons, to collect information about users who view or interact with their advertisements.

**USE OF YOUR INFORMATION**

* To operate, maintain, and improve our sites, products, and services.
* To analyse your usage of the App for the purpose of improving our App.
* To provide custom, personalized advertisements, content, and information. We may process your personal information to provide marketing and promotional materials to you. We may contact you through App notifications, text messages, emails or telephonic/digital calls.
* To respond to comments and questions and provide customer service.
* To send information including confirmations, invoices, notifications, and support and administrative messages.
* To communicate about promotions, upcoming events, and other news about products and services offered by us. The legal bases for our processing of your personal information are (a) our obtaining your consent for the processing of your personal information for the foregoing purposes, and (b) the fact that such processing is necessary for us to render the Service. We retain your personal information to provide the Service to you and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
* We may process your personal information as we believe to be necessary or appropriate, such as: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; and (f) to protect our rights, privacy, safety or property, and/or that of other users, including you.

**RETENTION OF PERSONAL INFORMATION**

We will retain your personal information for as long as your account is active, and as long as is reasonably necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

**LINKS TO OTHER SITES**

The Site may contain links or references to external websites. These are provided for your convenience only, and we do not have any control over the privacy or security practices and policies of third-party sites. Any personal information you provide on linked pages is provided directly to that third party and is subject to that third party's privacy policy. Please learn about the privacy and security practices and policies of external websites before providing them with personal information.

**SHARING OF YOUR INFORMATION**

We may share your information with the following recipients:

* To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.
* As we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, investigations, law enforcement offices, third party rights owners, credit risk reduction, and requests from public and government authorities, including public and government authorities outside your country of residence; (c) to enforce our terms and conditions; (d) to protect our operations, business and systems; (e) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (f) to allow us to pursue available remedies or limit the damages that we may sustain.
* To our subsidiaries or affiliates within our corporate family, to carry out regular business activities. These entities and affiliates may market to you as a result of such sharing.
* We may share or sell your information to an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, business transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

**SECURITY OF YOUR PERSONAL INFORMATION**

Our Platform adopts reasonable security measures and practices in place to protect the loss, misuse, and alteration of the information under our control. Once your information is in our possession, we adhere to such security guidelines, protecting it against unauthorized access. However, by using the Platform, the users accept the inherent security implications of data transmission over the internet and the World Wide Web which cannot always be guaranteed as completely secure, and therefore, there would always remain certain inherent risks regarding use of the Platform.

Any personal information you provide when using or relating to our services in any free and public space, including but not limited to any blog, message, network, audio & video chat, chat room, discussion page (a) shall not be deemed confidential, (b) shall not be regarded as personal information; and (c) shall not be subject to this Privacy Policy. Since such a public domain or space is accessible to third parties, these third parties may obtain or use your information for their own purposes, you should be cautious to communicate your information in these public contexts. Please note we shall not be held liable for any damages to you or to any third party may suffer as a consequence of your public disclosure of your personal information.

**CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy to reflect changes to our information practices. When we post changes to this Privacy Policy, we will revise the "Last Updated" date at the top of this Privacy Policy. We will alert you to material changes by, for example, placing a notice on our websites/app; posting the date our policy got last updated at the top of the Privacy Policy; or by sending you an email, when we are required to do so by applicable law. The most current version of the Privacy Policy will supersede all previous versions. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Services following the posting of changes to this policy will mean you consent to and accept those changes.

**CONSENT**

* By using our Platform or by providing your information, you consent to us for collecting, storing, processing, transferring and sharing information (including sensitive personal information) related to you in accordance with this Privacy Policy. If you disclose any personal information relating to other people to us, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.
* You, while providing your personal information over the Platform or any partner platforms, expressly consent to us (including our other corporate entities and affiliates, lending partners, technology partners, marketing channels, business partners and other third parties) to contact you through SMS, instant messaging apps, call and/or e-mail.

**HOW TO CONTACT US**

If you have any questions or suggestions regarding our Privacy Policy, please contact us by email at: contact@acefluency.com.