Privacy Policy of Videlise

Last Updated: 2025/08/14

1. Introduction

This Privacy Policy ("Policy") describes how **FOP Drobina Nataliia Oleksandrivna**, a sole proprietor registered in Ukraine (Tax Identification Number: 3345108167), operating under the brand name **Videlise**, collects, uses, stores, shares, and protects personal and non-personal information of users.

This Policy applies to:

- The Videlise mobile application ("App"), available for download on Google Play and Apple App Store; and
- The **Videlise website** located at https://videlise.com, including its subdomains and related online services (the "Website").

By accessing or using the App and/or the Website (collectively, the "Services"), you agree to the practices described in this Policy. If you do not agree with any part of this Policy, you must immediately discontinue using our Services.

This Policy complies with applicable Ukrainian laws, the **General Data Protection Regulation (EU) 2016/679 (GDPR)**, and other relevant international data protection frameworks.

We strongly encourage you to read this Policy carefully. If you have any questions, you can contact us using the details provided in Section 17 (**Contact Information**).

2. Information We Collect

To deliver and improve our Services, Videlise collects several types of information:

2.1 Information You Provide Directly

- Account Registration Data: Name, email address, password, and optional profile details (e.g., profile photo, username).
- **Payment and Billing Data**: Payment method, billing address, and related details (processed through secure third-party providers we do not store full card details).
- **User-Generated Content**: Photos, videos, audio, edits, and any other media you upload or create within the App or Website.
- Customer Support Correspondence: Messages, inquiries, or complaints sent to our support team (e.g., via email at support@videlise.com).

2.2 Information Collected Automatically

When using the Services, we automatically collect certain technical and usage data, including:

- **Device Data**: Device model, operating system, browser type, IP address, unique device identifiers.
- **Usage Data**: App interactions, editing activity, session duration, crash logs, and feature usage statistics.
- Cookies and Similar Technologies: To remember your preferences, enhance navigation, and improve functionality.

2.3 Information from Third Parties

We may receive information about you from:

- **App Stores**: Google Play and Apple App Store may provide installation, update, and purchase-related data.
- Analytics and Advertising Partners: Basic metrics, anonymized identifiers, or ad performance data, always subject to their respective privacy policies.
- **Social Media Platforms**: If you interact with Videlise via social media (e.g., sharing edited media), those platforms may provide us with limited account data.

All information is handled in accordance with this Policy and applicable laws.

3. How We Use Your Information

We process the information collected from you to provide, maintain, and improve our Services, while ensuring compliance with applicable laws and safeguarding your rights. The purposes for which we use your data include, but are not limited to:

3.1 Service Delivery and Account Management

- To create, verify, and manage your user account within the App or on the Website.
- To provide you with access to both **free and premium features**, including advanced photo and video editing tools.
- To process **payments and subscriptions** through secure third-party payment systems, and to ensure that any purchases are correctly applied to your account.
- To facilitate the **synchronization of user data** across devices, allowing you to continue editing your projects seamlessly.

3.2 Personalization and User Experience

- To personalize your experience by offering **custom filters**, **effects**, **and recommendations** based on your past usage patterns.
- To provide tailored **content suggestions**, tutorials, or creative prompts designed to help you make the most of the editing tools.
- To adjust the interface language, design, or layout in line with your preferences.

3.3 Improvement and Optimization

- To conduct research and analysis aimed at improving the performance, stability, and usability of our Services.
- To carry out A/B testing and evaluate new features or editing tools before broader release.
- To monitor usage trends, identify technical issues, and develop solutions that enhance user satisfaction.

3.4 Communication with Users

- To respond to inquiries, customer support requests, or complaints submitted via **support@videlise.com** or other official channels.
- To notify you of **service-related updates**, policy changes, or new releases.
- To send you, with your consent where required, **marketing communications** such as promotions, newsletters, or announcements of new features.

3.5 Security, Fraud Prevention, and Compliance

- To detect, prevent, and investigate fraudulent activity, misuse of our Services, or violations of our Terms of Service.
- To comply with **legal obligations**, including responding to lawful government requests or regulatory requirements.
- To enforce contractual rights, resolve disputes, and maintain the overall integrity of our systems.

4. Legal Basis for Processing Personal Data

As Videlise operates globally and serves users from different jurisdictions, we adhere to both Ukrainian law and international data protection regulations, including the **GDPR**. Our processing of personal data is based on the following legal grounds:

4.1 Contractual Necessity

We process your personal information where it is essential to fulfill a contract with you. For example, without your account data or payment details, we cannot deliver subscription-based features or provide full functionality of the App.

4.2 Consent

In specific situations, we may request your explicit consent before collecting or using your information. This includes:

- Sending marketing communications.
- Using optional analytics or advertising tools.
- Accessing your device's camera, microphone, or media library beyond the minimum required for core functionality.

You have the right to withdraw consent at any time. Withdrawal does not affect the lawfulness of processing carried out prior to such withdrawal.

4.3 Legitimate Interests

We may process certain data when it is necessary to pursue our legitimate interests, provided these interests do not override your fundamental rights and freedoms. Examples include:

- Enhancing and securing the functionality of the App and Website.
- Conducting troubleshooting and ensuring network stability.
- Protecting our intellectual property, preventing abuse, and improving customer service.

4.4 Legal Obligations

We may be required by law to retain or disclose certain personal data. Such obligations may arise in areas such as **tax reporting**, **record-keeping**, **or regulatory compliance**.

4.5 Vital Interests

In rare cases, we may process your personal data to protect vital interests of you or another person—for example, in an emergency situation where there is a potential threat to health or safety.

5. Data Sharing and Disclosure

We value your privacy and do not sell, rent, or trade your personal information to third parties for their independent marketing purposes. However, under certain carefully controlled circumstances, we may share your data as outlined below:

5.1 Service Providers and Contractors

We may engage trusted third-party companies and individuals to perform services on our behalf. These providers only receive the information necessary to perform their tasks and are contractually obligated to:

- Maintain the confidentiality and security of your data.
- Use the data solely for the specific purposes outlined in our agreements.

Examples of such providers include:

- Hosting and Cloud Infrastructure Providers (to securely store and process user data).
- Payment Processors (to handle subscription and purchase transactions).
- Analytics Platforms (to measure and improve performance of our Services).
- Customer Support Systems (to manage inquiries and technical issues).

5.2 Business Transactions

If Videlise undergoes a merger, acquisition, restructuring, sale of assets, or bankruptcy, your personal information may be transferred as part of the business assets. In such cases, you will be notified in advance of any material changes in the handling of your data.

5.3 Legal Compliance and Protection

We may disclose your information when required by law or if we believe in good faith that such action is necessary to:

- Comply with applicable legal obligations, court orders, or governmental requests.
- Enforce our Terms of Service, protect our intellectual property, or defend against legal claims.
- Detect, prevent, or investigate potential fraud, abuse, or security incidents.

5.4 Aggregated and Anonymized Data

We may share aggregated or anonymized information that cannot reasonably be used to identify you. Such data may be shared with partners, researchers, or advertisers for **statistical**, **analytical**, **or business purposes**.

6. Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes described in this Policy, unless a longer retention period is required or permitted by law.

6.1 General Retention Principles

- **Account Information**: Retained for the duration of your active account and for a reasonable period thereafter to comply with legal obligations or resolve disputes.
- **Payment Data**: Stored only as long as necessary to complete transactions and meet financial reporting requirements. We do not retain full credit card details.

- **User-Generated Content**: Retained until you delete it from your account or request deletion. Backups may persist temporarily for operational continuity.
- **Support Records**: Kept for a limited time to ensure quality of service and resolve potential disputes.

6.2 Marketing and Communication Data

• Retained until you opt out of marketing communications or withdraw consent. After that, such data will be promptly **deleted or anonymized**.

6.3 Usage and Log Data

 Retained for operational and security purposes for a limited period, typically not exceeding 12 months, unless required for regulatory or legal obligations.

6.4 Legal and Regulatory Requirements

Certain laws may obligate us to retain specific records for a longer period, such as:

- **Tax records** (up to 7 years under Ukrainian law).
- Compliance documents related to financial transactions.

6.5 Deletion and Anonymization

When personal data is no longer required, we will take appropriate measures to securely delete or anonymize it so that it can no longer be associated with you.

7. International Data Transfers

As a Ukrainian company serving users worldwide, Videlise may process and store your personal information outside of your country of residence. This can occur because our partners, service providers, or cloud infrastructure are located in different jurisdictions.

7.1 Transfer Locations

Your data may be transferred to and processed in:

- European Union (EU) countries, where GDPR standards apply.
- The **United States**, where certain infrastructure and service providers are based.
- Other jurisdictions where our contracted providers operate data centers or technical facilities.

7.2 Safeguards for Cross-Border Transfers

We take all reasonable steps to ensure that any international transfer of personal data provides an adequate level of protection. Such safeguards may include:

- Standard Contractual Clauses (SCCs): Legally binding agreements approved by the European Commission to ensure equivalent data protection abroad.
- **Binding Corporate Rules (BCRs):** Internal policies adopted by multinational service providers to maintain data protection.
- **Adequacy Decisions:** Relying on jurisdictions officially recognized by the European Commission as providing sufficient data protection.

7.3 User Consent

By using Videlise, you acknowledge and agree that your information may be transferred, stored, and processed outside of your home country. Some of these countries may have data protection rules that differ from those in your jurisdiction.

7.4 Service Providers Abroad

When sharing data with third-party providers outside Ukraine or the EU, we require them to:

- Process the information only for the agreed purposes.
- Implement strict security measures to protect data integrity.
- Refrain from using your information for unauthorized or unrelated activities.

8. Data Security

We are committed to safeguarding your information and have implemented administrative, technical, and physical security measures designed to protect your data from unauthorized access, use, alteration, or disclosure.

8.1 Technical Safeguards

- Encryption in Transit and at Rest: Sensitive data is transmitted using TLS/SSL protocols and, where applicable, stored with AES-256 encryption.
- **Secure Infrastructure:** Our servers and databases are hosted in controlled environments with restricted access and 24/7 monitoring.
- **Network Protections:** Firewalls, intrusion detection, and anti-malware tools are used to prevent unauthorized access and malicious activity.

8.2 Organizational Safeguards

- Access Control: Only authorized staff or contractors who require access for legitimate business purposes can access personal data.
- **Confidentiality Agreements:** All employees, contractors, and service providers are bound by strict confidentiality obligations.

• **Staff Training:** Regular training ensures awareness of cybersecurity and privacy best practices.

8.3 Incident Response

In the event of a suspected or confirmed data breach:

- 1. We will take immediate action to contain the incident and minimize harm.
- 2. Affected users will be notified without undue delay, in line with legal requirements.
- 3. We will cooperate with relevant supervisory authorities and regulators.

8.4 User Responsibility

While Videlise applies industry-standard safeguards, no system can guarantee absolute security. Users are responsible for:

- Keeping login credentials confidential.
- Avoiding the use of weak or reused passwords.
- Ensuring that devices used to access Videlise are protected against viruses and unauthorized access.

9. Your Rights

Depending on your location and applicable laws (including GDPR for users in the European Union and Ukrainian data protection legislation), you may have specific rights regarding your personal information. Videlise is committed to ensuring that you can exercise these rights fully and transparently.

9.1 Right of Access

You have the right to request confirmation as to whether we process your personal data and, if so, obtain a copy of that data along with details of how and why it is being processed.

9.2 Right to Rectification

If you believe that the personal data we hold about you is incomplete or inaccurate, you can request corrections or updates at any time.

9.3 Right to Erasure ("Right to be Forgotten")

You may request deletion of your personal information in certain circumstances, such as:

- When the data is no longer necessary for the purposes for which it was collected.
- If you withdraw your consent and no other legal basis for processing exists.
- If the data was processed unlawfully.

9.4 Right to Restrict Processing

You can request a limitation on how we process your data, for example if you contest its accuracy or object to its use while we verify your claim.

9.5 Right to Data Portability

Where technically feasible, you may request a copy of your personal data in a structured, commonly used, and machine-readable format. You may also ask us to transfer this data directly to another service provider.

9.6 Right to Object

You have the right to object to the processing of your data in specific circumstances, including for direct marketing or profiling purposes.

9.7 Right to Withdraw Consent

Where processing relies on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out before withdrawal.

9.8 Rights Related to Automated Decision-Making

If Videlise uses automated tools (such as AI-powered personalization or recommendations), you have the right not to be subject to decisions based solely on automated processing that significantly affect you, unless certain safeguards apply.

10. Exercising Your Rights

We provide clear and accessible channels for you to exercise your rights under this Policy.

10.1 How to Submit a Request

To exercise any of the rights listed above, please contact us using the following details:

Legal Entity: FOP Drobina Nataliia Oleksandrivna

Address: 66 Serhii Kolachevskyi Street, Office 14, Kryvyi Rih, Dnipropetrovsk Region,

50047, Ukraine

Email: <u>support@videlise.com</u>

Phone: +380 97 439 7995

For security purposes, we may require you to verify your identity before we act on your request. This may include providing a copy of your identification document or other appropriate proof.

10.2 Response Timeframes

- We aim to respond to all valid requests within one month.
- If the request is complex or if we have received a large number of requests, the response time may be extended by an additional two months, in accordance with GDPR.

• You will be notified promptly if an extension is required.

10.3 Limitations

In certain situations, we may not be able to fulfill your request, such as when:

- Doing so would infringe upon the rights of another individual.
- The data is required to comply with legal obligations.
- The request is clearly unfounded, repetitive, or excessive.

10.4 Fees

We do not charge a fee for processing reasonable requests. However, if a request is manifestly excessive or repetitive, we reserve the right to charge a reasonable administrative fee or refuse to act on such a request.

11. Cookies and Similar Technologies

Like most websites and mobile applications, Videlise uses cookies and similar technologies to enhance user experience, improve functionality, and analyze traffic. These technologies help us understand how you interact with our Services and allow us to deliver a more tailored experience.

11.1 What Are Cookies

Cookies are small text files that are stored on your device (computer, smartphone, or tablet) when you visit a website or use an application. They enable us to recognize your device, remember preferences, and improve the efficiency of our Services.

11.2 Types of Cookies We Use

- **Strictly Necessary Cookies**: Essential for the operation of our Website and App, enabling core functionalities such as authentication, account access, and security.
- **Performance and Analytics Cookies**: Collect information on how users interact with our Services (e.g., pages visited, time spent, errors encountered). This helps us improve performance and identify usability issues.
- **Functional Cookies**: Allow us to remember your choices and settings (e.g., preferred language, region, or theme).
- Advertising and Targeting Cookies: Enable us or our partners to deliver relevant ads, measure their effectiveness, and limit the number of times a particular ad is shown.
- Third-Party Cookies: Placed by analytics providers, advertising networks, or social media platforms to support integrations with our Services.

11.3 Duration of Cookies

- Session Cookies: Expire once you close your browser or app.
- Persistent Cookies: Remain on your device for a set period or until manually deleted.

11.4 Managing Cookie Preferences

You can manage or disable cookies at any time by adjusting your browser or device settings. Please note that disabling certain cookies may limit functionality, and some parts of the Services may not work properly.

11.5 Do Not Track Signals

Currently, our Website and App do not respond to "Do Not Track" browser signals due to the absence of a universal industry standard. However, we continuously review industry developments and may implement this functionality in the future.

12. Tracking, Analytics, and Third-Party Tools

To ensure continuous improvement and provide better services, Videlise makes use of third-party tools for analytics, advertising, and user engagement. These tools may collect information about how you interact with our Services.

12.1 Analytics Services

We use trusted analytics providers such as **Google Analytics**, **Firebase Analytics**, and other tools to measure and analyze usage. These services help us understand:

- Which features are most popular.
- How users navigate within the App and Website.
- Technical performance, including crash data and error logs.

12.2 Data Collected by Analytics Tools

Analytics providers may collect:

- Device type, operating system, browser version, and language settings.
- IP address (which may be anonymized in accordance with applicable law).
- Approximate geographic location.
- Session duration, navigation patterns, and in-app activity.

12.3 Advertising Networks

We may partner with advertising platforms such as **Google Ads**, **Meta Ads**, or similar providers to deliver personalized ads. These partners may use cookies, SDKs, or tracking pixels to measure performance and optimize ad targeting.

12.4 Social Media Integrations

Our Services may include social media buttons or widgets (e.g., "Share" or "Like"). These features may collect your IP address, browser details, and interaction data. Usage of such features is governed by the privacy policies of the respective social networks.

12.5 User Choices and Opt-Outs

- You may opt out of Google Analytics tracking using the Google Analytics Opt-Out Browser Add-on.
- Many advertising networks provide opt-out mechanisms through services like the Digital Advertising Alliance (DAA) or the European Interactive Digital Advertising Alliance (EDAA).
- Within mobile devices, you can limit ad tracking through device settings (e.g., "Limit Ad Tracking" on iOS or "Opt out of Ads Personalization" on Android).

13. Third-Party APIs & Integrations

Videlise enhances its functionality by integrating with third-party Application Programming Interfaces (APIs) and services. These integrations enable features such as advanced editing, media storage, analytics, and social sharing.

13.1 Purpose of Integrations

We only connect to external APIs when necessary to provide or improve specific features of our Services. Examples include:

- Image and Video Processing APIs to apply filters, transformations, or AI-based enhancements to your content.
- Cloud Storage APIs to allow safe storage, retrieval, and synchronization of your projects across devices.
- Payment Provider APIs to securely handle subscriptions and purchases.
- Social Media APIs to facilitate sharing of edited content to external platforms.

13.2 Data Handling with Third Parties

When Videlise interacts with third-party APIs:

- We minimize data transfers to only what is strictly required for functionality.
- All transfers are secured with encryption protocols (HTTPS/TLS).
- We ensure compliance with the official Terms of Service and Privacy Policies of those providers.
- We prohibit third-party providers from using the data for purposes beyond the requested service.

13.3 Examples of Third-Party Services

- Google APIs: for analytics, push notifications, and distribution via Google Play.
- Apple APIs: for distribution through the App Store and device-specific features.
- Payment Gateways: such as Stripe, PayPal, or other PCI-DSS-compliant services.
- Al or Editing Tools: third-party engines or frameworks that enable enhanced editing capabilities.

13.4 User Awareness

We disclose in this Policy and in our Terms of Service that certain features of Videlise require interaction with third-party APIs. By using these features, you acknowledge and consent to such integrations.

14. App Store & Google Play Compliance

Videlise is developed, maintained, and distributed in full compliance with the requirements of both the **Google Play Store** and the **Apple App Store**. This ensures that our users receive a safe, reliable, and policy-compliant product.

14.1 Policy Adherence

- We regularly review and update Videlise to comply with the latest versions of the Google Play Developer Program Policies and the Apple App Store Review Guidelines.
- We maintain internal monitoring systems to detect and resolve potential violations related to user data, content, or advertising.

14.2 Content Standards

- Videlise does not contain or promote prohibited content, including but not limited to: sexually explicit material, hate speech, excessive violence, or deceptive claims.
- All media editing tools are designed for legitimate, creative purposes, and not for misuse or unlawful activities.

14.3 Data Protection Obligations

- Videlise complies with the Google Play User Data Policy and the Apple Privacy Guidelines.
- All required disclosures about data collection, permissions, and storage are clearly stated in the App Store listings and in this Policy.
- User consent is explicitly requested for sensitive permissions (e.g., access to camera, microphone, or media library).

14.4 Accurate Representation

- Screenshots, descriptions, and promotional materials in Google Play and the App Store truthfully represent the features and capabilities of Videlise.
- We avoid manipulative or misleading practices in marketing or in-app behavior.

14.5 Security and Safety

- Prior to each release, Videlise undergoes internal security testing to detect vulnerabilities and ensure compliance with platform rules.
- We implement safeguards against malware, spyware, or any malicious code.

14.6 Store-Specific Requirements

- For **Google Play**, we comply with Android permissions management, API usage restrictions, and rules concerning advertising identifiers.
- For **Apple App Store**, we comply with App Tracking Transparency (ATT), iOS permissions requirements, and in-app purchase regulations.

By downloading Videlise from either Google Play or the Apple App Store, you agree to comply with the terms set by these platforms in addition to this Privacy Policy and our Terms of Service.

15. Children's Privacy

Videlise is not directed toward children under the age of **13** (or the minimum age of digital consent in your jurisdiction, such as 16 in the EU under GDPR). We do not knowingly collect personal information from children.

- If you are under the applicable minimum age, you must not use the App or Website, or provide any personal data to us.
- If we learn that we have inadvertently collected personal information from a child without proper parental consent, we will take immediate steps to delete such data from our systems.
- Parents or legal guardians who believe that their child may have provided personal
 information to Videlise are encouraged to contact us at support@videlise.com so
 that we can address the matter promptly.

By using our Services, you represent and warrant that you meet the minimum age requirements of your country or that you have obtained verifiable parental consent.

16. Amendments to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements.

16.1 Notification of Changes

- Any material changes will be communicated through a notice on our Website or within the App.
- We will update the "Last Updated" date at the top of this document whenever a revision is made.

16.2 User Responsibility

It is your responsibility to review this Policy periodically to stay informed about how we handle your data. Continued use of Videlise after any updates indicates your acceptance of the revised Policy.

16.3 Version Control

Archived versions of this Privacy Policy will be made available upon written request. This ensures transparency and allows you to track the evolution of our privacy practices.

17. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact us:

Legal Entity: FOP Drobina Nataliia Oleksandrivna

Tax Identification Number: 3345108167

Address: 66 Serhii Kolachevskyi Street, Office 14, Kryvyi Rih, Dnipropetrovsk Region,

50047, Ukraine

Phone: +380 97 439 7995

Email: support@videlise.com