

# **Privacy Policy**

**Effective date: March 4, 2021**

Your privacy is important to us and therefore we put significant efforts into making sure that we secure personal information related to you properly

Trionity Web Services Ltd ("us", "we", or "our") operates the website and the Ringtones Maker mobile application (the " Services"). This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Services and the choices you have associated with that data. We use your data to provide and improve the Services. By using the Services, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Note that this privacy notice is subject to the laws of the State of Israel.

## **Information Collection And Use**

You are not legally obligated to provide us with any personal information related to you. Should you wish not to provide us with the requested personal information related to you, kindly do not download or use the Application and/or Services. You can remove the Application from your smart device at any given time.

When you download the Application, you will be required to permit us to access your smart device's camera, microphone, and relevant data (including photos, videos, songs, and audio formats, saved on your smart device) (collectively, "Your Data") to provide you with the Services.

We collect several different types of information for various purposes to provide and improve our Services to you.

## **Types of Data Collected**

While using our Services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data").

We use various tracking tools and technologies, such as analytics tools (collectively, "Tracking Tools") across the Services to collect information about you and your activities ("Analytical Information").

Personally identifiable information may include, but is not limited to:

### **Usage Data**

We may also collect information that your device or browser sends whenever you visit our Services or when you access the Services by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Services by or through a mobile device, We collect information about how you use the Services, and how your device interacts with the Services. This includes user movements (such as the time and date you accessed the Services, the features you used, your preferences, page scrolling and clicks, and for how long you use the Services) as well as interactions, such as a record of the fact that you have taken a screenshot or screen recording of a screen within the Services.

### **Tracking Data**

We may use tracking pixels (also known as clear GIFs and web beacons) which are used to anonymously track the online usage patterns of users

of the Services. In addition, we may also use tracking pixels in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. This information allows for more accurate reporting and improvement of the Services.

You may be able to opt-out of us collecting some Analytical Information, through settings within the Services. Moreover, some of the Tracking Tools are set by us, and some may be set by third parties, in which case the third party hosts it.

## **Other Sources of Personal Data**

Some of the personal data mentioned above is collected or received directly from you; however, some of the personal data is obtained by us from third party sources.

An example of third-party sources might be vendors of products and Services (“Vendors”), such as the following analytics Vendors we engage in connection with the Services:

1. AppsFlyer ([Privacy Policy](#))
2. Firebase ([Privacy Policy](#))
3. Amplitude ([Privacy Policy](#))

These Vendors may also collect your personal data through their respective Tracking Tools incorporated or embedded within our Services. We use their Services for the purposes set forth below.

## **How We Use Personal Data**

To provide and maintain the Services. To notify you about changes to our Services. To allow you to participate in interactive features of our Services when you choose to do so. To provide customer care and support. To provide analysis or valuable information so that we can improve the Services. To monitor the usage of the Services. To detect,

prevent and address technical issues Transfer Of Data Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Israel and choose to provide information to us, please note that we transfer the data, including Personal Data, to Israel and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Trionity Web Services Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Legal Bases (GDPR-only): The legal bases for processing and collecting this personal data and information for the above purposes, may be one or more of the following: (a) your consent; (b) our legitimate interest in operating our Services, as well as ongoing management and development of our business; (c) contractual necessity, such as performing under the Terms of Use or other contracts (as well as in order to take steps at your request prior to entering into a contract); and (d) legal obligation, such as retaining invoice information of our paid subscribers to comply with financial regulations.

## **Personalized Services & Analytical Information**

In some of our Services, we will use and share (such as with advertising networks and Services Providers) the Analytical Information we obtain to serve you with advertisements to products and Services from us and third parties that we believe may suit your interests. See the Section titled 'Third-Party Services' for more information on how this works.

Legal Bases (GDPR-only): The legal basis for collecting and processing your Analytical Information and other information for profiled advertising purposes, is our legitimate interest in operating our Services, as well as ongoing management and development of our business.

## **What Are Your Choices?**

You can opt-out of our subscription push notifications through the unsubscribe option in the Application settings. In addition, you can opt-out of us collecting non-essential traffic data through your settings within the Application. If you need our help, please contact us at [ringtones@trionity.net](mailto:ringtones@trionity.net), and we will make commercially reasonable efforts to assist you.

## **For How Long Do We Keep Personal Information?**

We do not keep personal information related to you on our servers. Personal information related to you is kept by our cloud-based product-analytics Services Providers for as long as necessary for the purposes for which such personal information is processed unless otherwise required under applicable law. If we retain personal information related to you for any legitimate business purpose other than to operate the Application or provide the Services, we will make efforts to limit the access to such personal information and the retention time to a minimum. Note that we can keep aggregated non-identifiable data without limitation

## **Disclosure Of Data**

### **Legal Requirements**

Trionity Web Services Ltd may disclose your Personal Data in the good faith belief that such action is necessary to:

To comply with a legal obligation To protect and defend the rights or property of Trionity Web Services Ltd To prevent or investigate possible wrongdoing in connection with the Services To protect the personal safety of users of the Services or the public To protect against legal liability Security Of Data The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **Services Providers**

We may employ third party companies and individuals to facilitate our Services ("Services Providers"), to provide the Services on our behalf, to perform Services-related Services or to assist us in analyzing how our Services is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links To Other Sites Our Services may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

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**

Our Services does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data

from children without verification of parental consent, we take steps to remove that information from our servers.

## **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Services, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us: by email: [ringtones@trionity.net](mailto:ringtones@trionity.net)