

DATA PRIVACY POLICY

PUNX ("we," "us," or "our") is committed to protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, disclose, share, and retain face data obtained through our face filter app that utilizes the Akool third-party face swapping API. By using our app, you consent to the practices described in this Privacy Policy.

Please review the Akool Privacy Policy [here](#) for further information on how they handle data.

1. Information We Collect:

Face Data

"We use face images to perform face swaps. We gather facial data encompassing features like eye, mouth, and nose positions, as well as facial landmarks or geometry used for applying face swap. The face data processed by our app is used solely for the purpose of generating face-swapped images and is not stored or accessed by our systems."

2. Use of Face Data:

"The collected facial feature data, encompassing critical markers like eye, mouth, and nose positions, serves as the cornerstone for several core functionalities within our application framework.

Initially, this dataset underpins our face swap feature, leveraging advanced computer vision algorithms to accurately identify and interchange facial attributes. The precision in detecting and manipulating these key facial landmarks allows for a seamless and realistic face swap experience, driven by complex mathematical models and neural network architectures.

Furthermore, the collected facial data becomes integral to our ongoing machine learning processes. Through iterative model training and optimization, we continually enhance the

performance of our filters. This involves fine-tuning algorithms based on a wealth of accumulated facial data, enabling our filters to adapt dynamically to diverse facial structures, expressions, and environmental conditions."

3. Disclosure and Sharing of Face Data

"We do not disclose or share any collected face data with third parties unless explicitly authorized by the user or required by law. The face data remains within the confines of our application and is not shared externally without user consent."

4. Retention of Face Data:

"Users have the option to delete their face data at any time through the app. Typically, we retain face data on the cloud for 3 months. After this period, the data is automatically deleted from our storage systems."

5. Storage and Retention of Face Data:

"The collected face data is stored securely on our servers or locally on the user's device. We employ industry-standard security measures, including encryption, to safeguard this information. We retain face data only for as long as necessary to provide the intended functionality within the app. Upon user request or account deletion, the data is promptly deleted from our servers and systems."

6. Google Analytics:

"We use Google Analytics to collect information about how users interact with our website and app. Google Analytics collects information such as the pages you visit, your IP address, the type of device you are using, and your general location. This information helps us analyze user behavior and improve our services. Google Analytics may also use cookies. For more

information on how Google Analytics collects and processes data, please visit Google's Privacy & Terms."

7. Technical Information:

"When you use a website or mobile application like ours, certain internet and network activity information gets generated and logged automatically. These are the types of technical information we collect:

- Log data: Our servers passively keep an electronic record of your interactions with our apps, including where you navigate within our website and apps, your IP address, browser type and settings, the date and time of your visit, search terms, which elements of our site and services you use the most, device data, and cookie data. We use log data to operate our services, maintain security, ensure reliable performance, and improve your experience.

- Device data: We collect and combine data about the devices you use to access our apps and services, and data about your device usage and activity.

- Metadata of visual information: We collect the metadata linked to your content, making it more searchable and interactive.

- Cookie data: We use "cookies" and similar technologies to collect log data and operate our services. You can learn more about how we use cookies below."

8. Cookies:

"We automatically collect certain information through the use of 'cookies.' Cookies are small data files that are stored locally. We use cookies to collect information about your device, including where available your IP address, operating system, and browser type, for system administration and to report information to our branded partners.

We may store some information locally when you visit the Site or use Services. This information facilitates your use of the site or Services, personalizes your experience, and helps us to remember your preferences. The information stored in a cookie provides features that recognize your account as logged on and other Site or Services features. We do not have any control over cookies which our advertisers or branded partners may use."

9. Service Data:

"To use our Services, you should provide a photo prior to the event of photo editing. Since the processing requires an Internet connection and is performed on our servers, the photos are sent there through the encrypted connection. We use Secure Socket Layer technology to protect the privacy and integrity of the transmission process.

For non-registered users and users who don't share their results within the Services, the original photos and results are automatically removed from our servers by two weeks after the last interaction. For registered users who share their results within the Services that provide special social network features, the shared content will be stored on the servers and shown within the Services unless a user either removes the images themselves or requests such a removal by contacting our support team.

In addition, most of the Services involve facial recognition mechanisms, which are used in two ways:

- Locally on your device: Provided that the access to Gallery is granted, we use facial recognition mechanisms to scan your Gallery for facial photos and group them. This makes part of the recommendation system and can also be used in other ways with the only aim to improve your experience within the Service. The detected facial key points are stored on your device until you delete the Service or clear the Service data.

- On the server: Whenever you apply an effect that involves face manipulation, we use other special face recognition technologies on the server side to detect a face in a photo, find required facial key points (the set of points varies with the effect), and apply the effect to your photo based on the detected key points. In this case, the key points are temporarily cached in the server's RAM between processings and get removed shortly after the last effect has been applied to the corresponding photo."

HOW WE USE YOUR PERSONAL INFORMATION

We use personal information and service data collected through the Services:

- to communicate with you or third parties;
- to process your requests and transactions;
- to improve the Services;
- to customize the services and/or products we provide to you;
- to assist with our product and service development;
- to perform marketing activities;
- to provide relevant advertising;
- and for other purposes related to our business.

WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

Personal information (and non-personal information) collected through the Services may be shared with companies and organizations that perform services on our behalf (for example, companies that provide data management or other support services to us such as data storage and Web hosting services). We may share your personal information (and non-personal information) with third parties to serve you relevant advertising (learn how advertising partners collect and use data) and market our products, but we won't sell your personal information.

Also, we may disclose the personal information we collect through the Services when we, in good faith, believe disclosure is appropriate to:

- comply with applicable law (e.g., in response to a valid court order or subpoena);
- prevent or investigate a possible crime, such as fraud or identity theft;
- enforce or to apply our Terms of Service and other agreements;
- to protect the rights, property or safety of us, our users or others;
- or to protect your vital interests.

We do not disclose your images, which you have uploaded for editing and manipulation to any of the Services unless you provide explicit consent to show your images at our Site, Mobile and other Services, or at third-party services.

Your personal information and other data collected by us may be transferred to another company that has acquired our stock or assets, for example, as a result of a sale, merger, reorganization, dissolution or liquidation. If such a transfer occurs, the acquiring company's use of your personal information will still be subject to this Privacy Policy.