

Privacy Policy

Effective Date: July 5, 2023.

This privacy policy (“Privacy Policy”) describes what personal data AI Pictures, Inc 919 North Market Street , Suite 950, Wilmington, Delaware , 19801 (“G69”, “we”, “us”, or “our”) collects, the purposes for collecting this personal data, who we may share personal data with, and what rights you may have under applicable data privacy law. This Privacy Policy applies to our website www.g69.app (the “Website”), the iOS mobile applications “G69” (the “Mobile Application”), and their associated services, features, and functionalities (collectively, together with the Website and the Mobile Applications, the “Services”).

1. Contact

G69 is the controller of your personal data in connection with the Services. If you would like to contact us (including our data protection officer), please contact: contact@g69.app

2. Changes to G69 Privacy Policy

G69 may update or modify this Privacy Policy at any time effective upon posting the revised Privacy Policy with an updated “Effective Date” above, on the Services. We may give notice of such updates or modifications by any reasonable means, including by posting a revised version of this Privacy Policy on the Services.

3. Categories of Personal Data

A. Overview

To provide the Services, G69 collects certain personal data from you. G69 collects your personal data from the following sources:

When you access our Services

When you register for or use the Services

When you contact us

The provision of your personal data is necessary in order to access and use the Services. If you do not want G69 to process your personal data, please do not access or use our Services.

B. When you access our Services

Each time you access our Services, we and our third party service providers may collect certain usage data. This data includes:

Information about the browser type and the internet service provider of the user as well as the operating system used and its version (e.g., Windows 7, Apple OS, etc.);

IP address (Internet protocol address) of the accessing computer, tablet or smartphone (the IP address is compared with a geo database and the origin or country, state and city of the user is determined);

Geo-Location of your mobile device (When using the Services, G69 needs your geo-location for being able to recommend to you users nearby. Your current location might be shown to other members unless you object to it in your privacy settings. The location shown will display the country and the municipality/ city you are currently located in);

Name of the page accessed;

Date and time of access;

The referrer URL (origin URL) from which the user came to the accessed page;

Amount of data transferred;

Status message about whether the retrieval was successful;
Session identification number;

Screen resolution used;

Network type (mobile, WLAN);

Mobile network and internet service provider (on iOS devices);
Time zone;

System language;

iOS IDFA and iOS related ID (on Apple devices) and device related ID (on Android devices).

The following usage data is stored in the so-called login data records every time the G69 member logs into the Services:

Date and time of login;

Internal user identification number (UIN) and information on the Services (as described below);

IP address (Internet protocol address);

Session identification number;

Session participants pseudonym.

For more information on the use of cookies and other tracking technologies on our Services, please see the “Cookies & Tracking” and “Online Analytics” sections of our Privacy Policy, below.

C. When you register for or use the Services

Minimum information for registration process and Basic Membership

When initially registering for the Service free of charge (the “Basic Membership”), you are asked to provide certain minimum information without which the registration cannot be completed. The mandatory data required for registration is:

Your gender and who you would like to connect with
E-mail address
Apple account

Further information obtained during registration process and membership
While registering for the Services or otherwise using the Services, we may collect the following data:

Date of birth
Name
Information about yourself

Information about your potential match

Pictures

Any other data (including personal data) you may choose to provide to us

Further, we may collect the following data:

Information about what you are providing and looking for

Gender

Age

Pictures

Any other data (including personal data) you may choose to provide to us

Purchase of Premium Membership

If you decide to use a paid service from G69 via the Services (a “Premium Membership”), G69 does not collect or store any further data. Information collected as a part of the Premium Membership, including the credit card or bank data, name and addresses are collected and stored by G69 payment provider only.

Communication between users of the Services

When using the Services, you may have the option of communicating with other users via text messages.

Push notifications

If you allow on your mobile device G69 to send you messages, you may receive push notifications from us as part of using the Services. These push notifications may include information regarding the Services or other information or marketing materials. You can modify or prevent the receipt of push messages at any time via the device settings of your mobile device or in the Mobile Applications.

D. When you contact us

G69 may also collect any other personal data you may provide us when you choose to contact us. For example, you may provide us personal data when we are providing you with customer support.

Additionally, for example, on the Services, you can subscribe to a free newsletter and updates of promotional content for the G69 platform by clicking on a checkbox. When registering for the newsletter, the data from the input mask is used.

4. Personal data processing purposes

G69 processes your personal data for the following purposes:

To provide and perform our Services, including to create and manage your account, provide you with customer support and respond to your requests, and communicate to you about our Services.

To connect you with other users of our Services.

Security purposes, including monitoring, verification, and prevention and defense against abuse.

To provide membership offers and specific offers about the Services.

To provide you with advertising, marketing, or informational materials which may interest you.

To be able to collect your payment for the Services.

For the functionality of the Services, including for the improvement, optimization and analysis of the Services.

For the integration of social plugins and social share functions.

Sending information that you request from us, including responding to customer support requests or information about G69 or the Services.

Complying with applicable laws, rules, or regulations, law enforcement, government agencies, or governmental mandate.

Engaging in any other activities discussed under this Privacy Policy.

5. Legal basis for the processing of personal data

G69 legal basis for processing your personal data will depend on the personal data collected and the specific context for which we collect it. We process your personal data:

When we have consent for processing personal data. If you choose to provide us with information that may be considered “special” or “sensitive” in certain jurisdictions, you’re

consenting to our processing of that information in accordance with this Privacy Policy.

When processing personal data is necessary to fulfill the contractual relationship with you, including to provide and perform our Service and to connect you with other users of the Service.

If processing personal data is in the legitimate interest of G69, including for security purposes, to provide you with offers or materials which may interest you, to collect payment, for the functionality of the Services, integration of social plugins and social share functions, and sending information that you request from us.

To comply with legal requirements, including applicable laws and regulations.

6. Disclosure of Personal Data to Third Parties

With other users: You may disclose personal data with other users of the Services when you voluntarily disclose information on the Service (including through your profile).

With service providers: G69 uses service providers to help us operate, distribute, market, and improve our Services. Service providers receive from G69 only the personal data that they need for their specific activity. G69 uses, among other things, service providers for sending emails, newsletters or text messages to their members. Service providers also provide the G69 server capacity. G69 uses service providers to process and store your data securely. External payment services and service providers in connection with debt collection support G69 in processing payments. Depending on which payment method you select in the ordering process, payment providers collect your data independently to process payments (e.g., bank details or credit card details).

With law enforcement / when required by law: In addition, personal data can be transmitted to third parties if G69 should be obliged to do so by law, legal process, or by enforceable administrative or judicial order, or to assist in the prevention or detection of a crime, or to protect the safety of any person.

To enforce legal rights: We may also disclose personal data to third parties: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business

partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

With corporate transactions: We may disclose your personal data if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other change of ownership or control.

With your consent: We may ask for your consent to share your personal data with third parties. In any such case, we will make it clear why we want to share the personal data.

7. Personal data retention

We store your personal data for as long as necessary to provide our Services and as permitted by applicable law.

If you decide to stop using our Services, you can delete your account. Following account deletion, we implement a safety and security window of thirty (30) days following the account deletion. Following an account ban, we also implement a safety and security window of thirty (30) days following the ban. During this period, your data will be retained but it won't be visible anymore to others.

After that, we will begin with the deletion of your data, provided that there is no legal retention requirement for this data. We may block deletion of that data on the basis of our legitimate interest (for example, to safeguard the community, to prevent or detect criminal actions, when involved in official investigations, litigation, or in a claim or dispute with G69, or it is otherwise necessary to retain data to comply with our legal obligations or as necessary in connection with a legal proceeding). We also keep records of consents users give us to evidence our compliance with applicable law.

Please note that if you choose to "deactivate your account", your data won't be deleted but your account is merely paused. During this time, your profile won't be recommended to others, but your existing matches will still be able to view your profile.

The following applies to a Basic Membership: G69 has the right to automatically delete personal profile data from basic members who are inactive for twenty-four (24) months.

The following applies to a Premium Membership: The personal data of G69 premium members is stored for the duration of the contractual relationship. Once falling back to an active Basic Membership, your data is still being stored. However, G69 may automatically delete personal profile data from basic members who are inactive for twenty-four (24) months.

Notwithstanding the foregoing, G69 may delete any data from you (whether you have a Basic Membership or Premium Membership) in the event you have been blocked, removed, or suspended from our Services.

8. Your personal data rights and choices

We provide the following options and tools available to you in order to be in control of your data:

Access/update tools in the Service: Tools and account settings may be able to help you access or update information that you provided to us and that's associated with your account directly within the Service.

Device permissions: Mobile platforms can have permission systems for specific types of device data and notifications, such as phone contacts, pictures, location services, push notifications and advertising identifiers. You can change your settings on your device to either consent or oppose the collection or processing of the corresponding information or the display of the corresponding notifications. Of course, if you do that, certain Services may lose functionality.

Account deactivation: You can deactivate your account and stop all information collection.

Account closure: You can close your account by using the corresponding functionality on the Service and remove the information that you provided.

Depending on where you live, you may have certain rights under applicable data privacy law. These include:

The right to be informed. You may have the right to know what personal data we process about you and why (we provide this information to you in this Privacy Policy).

The right to access or know. You may have the right to request confirmation from G69 as to whether we process personal data

about you. You may have the right to request a copy of your personal data.

The right to data portability. You may have the right to request a copy of your personal data in a machine-readable format.

The right to delete or erase (i.e., the right to be forgotten). You may have the right to delete your personal data in certain circumstances.

The right to correct/rectify/update. If the personal data we hold about you is inaccurate, you may have the right to have it corrected. You may always correct your personal data through updating your information through the Services.

The right to restrict processing. In certain circumstances, you have the right to request that our personal data processing is stopped for certain purposes.

The right to object. In certain circumstances (including where personal data is processed on the basis of legitimate interests or for the purposes of marketing), you may have the right to object to that processing.

The right to withdraw consent. If your personal data is processed by us on the basis of consent, you may withdraw consent at any time by contacting contact@g69.app. However, if you withdraw your consent, and we no longer have a legal basis for processing your personal data, we cannot offer our Services to you.

The right to lodge a complaint. If you feel we have not resolved your concern, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). If you live in a country or territory located in the European Union (EU) or European Economic Area (EEA), you may also get in touch with your local Data Protection Regulator. If you live in a country outside the EU, you may have the right to lodge a complaint with your local privacy or data protection regulator.

You can exercise any of your rights listed above by writing an email to contact@g69.app with the topic personal data inquiry. Before we can honor your request, we may confirm that you are the consumer whose personal data is sought, or a person authorized to act on your behalf. In addition,

depending on the nature of your request, we may request verifying information from you, such as identifiers or service history already known to or collected by us.

9. Cross-border data transfers

If personal data is transferred outside of its country of origin, we take commercially reasonable efforts to protect such personal data, such as by entering into certain standard contractual clauses as approved by the European Commission or other approved data transfer mechanisms. In the event we transfer personal data outside of the European Union or the European Economic Area to a country which data protection laws have not been deemed adequate by the European Commission or other competent governmental body, we will use standard contractual clauses as approved by the European Commission or other approved data transfer mechanisms.

10. Children

Our Services are restricted to individuals who are 18 years of age or older. We do not permit individuals under the age of 18 to use our Services.

11. Cookies & Tracking

Our Services use cookies. Cookies are small text files that are sent when you visit a website and stored in the user's browser or your device's memory. If the corresponding website is called up again, the user's browser sends back the content of the cookies and thus enables the user to be recognized. Certain cookies are automatically deleted after the end of the browser session (so-called session cookies), others are stored in the user's browser for a specified time or permanently and then delete themselves (so-called temporary or permanent cookies).

What cookies does G69 use?

Essential cookies: These cookies are strictly necessary cookies to provide you with our Services, such as enabling you to log in, remembering your preferences, authenticating our users, and keeping you safe by detecting malicious activity.

Functional cookies: We use analysis cookies to record the usage behavior (e.g., visited sub-pages) of our users and to be able to evaluate them in statistical form.

Marketing cookies: Please see the below.

Marketing cookies and third-party tracking

We allow other companies to collect data from our users using marketing cookies. This enables us and third parties to display interest-based marketing to the users of our Services, which is based on an analysis of their usage behavior (e.g., clicked advertising banners, visited sub-pages) overall and not limited to our Services.

How can you control cookies?

You can control cookies by utilizing our cookie banner provided on the Services.

You can also control via your browser settings.

Please note, however, that our Services may not work or only function to a limited extent without cookies. We also recommend the website of www.YourOnlineChoices.com, where you can find information and assistance in connection with web tracking mechanisms.

12. Online Analytics

We collect statistical information about the use of our Services in order to make them more user-friendly, to measure reach, to be able to carry out market research and to display marketing and advertisements relevant to you. For this purpose, we work with various authorized service providers and use online analytics tools, which are described below.

Google Analytics

The Website uses Google Analytics, a web analytics service provided by Google. Google Analytics uses cookies that are stored on your computer, tablet or smartphone and that enable an analysis of your use of the Website. These are cookies from Google itself (Google Analytics cookies). G69 uses Google Analytics with the additional function offered by Google for anonymizing IP addresses. Google will use this information to evaluate your use of the Website, to compile reports on Website activity and to provide other services related to Website and internet use, such as Google Analytics reports on performance based on demographic characteristics and interests. Google Analytics is being used on the Mobile Applications via the Firebase SDK, provided by Google.

Use of Google Ads Conversion Tracking

G69 uses the online advertising program "Google Ads" and, as part of Google Ad Words, Google Conversion Tracking. Google Conversion Tracking is an

analysis service provided by Google. If you click on an advertisement placed by Google, a cookie for the conversion tracking is placed on your computer. These cookies lose their validity after ninety (90) days. If you visit certain websites from our Services and the cookie has not yet expired, Google and we can recognize that you clicked on the advertisement and were forwarded to our Services. Every Google Ads customer receives a different cookie. The information obtained using the conversion cookie is used to create conversion statistics for ads customers who have opted for conversion tracking. Here, G69 finds out the total number of users who have clicked on their advertisement and have been forwarded to a page provided with a conversion tracking tag.

Use of Meta Custom Audiences

G69 wants to present “interest-based advertising” on Meta and limit the frequency with which certain advertisements are displayed. Meta collects HTTP header information (including IP address, information about the web browser, page storage location, document, URL of the website or the respectively accessed page and user agent of the web browser as well as day and time of use); and events (the user’s website visit to G69, registration, purchasing). If the Meta ID contained in the Meta cookie can be assigned to a Meta user, Meta will assign this user to a “custom audience” based on the rules we have defined, provided the criteria applicable to this are met. We use the information received in this way to display ads on Meta. However, ads are only displayed from a “Custom Audience” size of 20 different users - so no conclusions can be drawn about the properties of the individual users from the placement of the ads. The assignment to a “Custom Audience” takes place for a maximum of 180 days. This period starts again when you visit our Website again and there is a conformity with the same “Custom Audience” rules. Meta can assign your visit to our Website and your related activities to your Meta user account. We cannot do this. We only receive statistical information from Meta about the use of our Website through Audience Insights.

Social Plugins

The integration of social plugins regularly leads to the providers of the plugins storing cookies. In order to increase the protection of your data when visiting our Services, the plugins can be integrated into the page. Only when you activate the plugins will your internet browser or app establish a direct connection to the servers of the respective plugin provider. This gives the plugin provider the information that your internet browser has called up the corresponding page of our online offering, even if you do not have a user

account with the provider or are not currently logged in. Log files (including the IP address) are transmitted from your Internet browser directly to a server of the respective plug-in provider and saved there if necessary. The plugins are independent extensions of the plugin providers. We therefore have no