

If you are a user having your usual residence in the US, this [Privacy Policy](#) shall apply.

If you are a user having your usual residence in the EEA and Switzerland, this [Privacy Policy](#) shall apply.

If you are not in the US, EEA or Switzerland, this [Privacy Policy](#) shall apply. There may also be jurisdiction specific provisions for certain countries or regions. Please refer to your local privacy policy for more information.

Privacy Policy

Last updated: November 2020

(If you are a user having your usual residence in the US)

Welcome to AnyVoice (the “Platform”). The Platform is provided and controlled by AnyVoice Inc. (“AnyVoice”, “we” or “us”). We are committed to protecting and respecting your privacy. This Privacy Policy covers the experience we provide for users age 13 and over on our Platform. For information about our under-13 experience (“Children’s Platform”) and our practices in the United States regarding children’s privacy, please refer to our [Privacy Policy for Younger Users](#).

Capitalized terms that are not defined in this policy have the meaning given to them in the [Terms of Use](#).

What information do we collect?

We collect information when you create an account and use the Platform. We also collect information you share with us from third-party social network providers, and technical and behavioral information about your use of the Platform. We also collect information contained in the messages you send through our Platform and information from your phone book, if you grant us access to your phone book on

your mobile device. More information about the categories and sources of information is provided below.

Information you choose to provide

For certain activities, such as when you register, upload content to the Platform, or contact us directly, you may provide some or all of the following information:

- Registration information, such as age, username and password, language, and email or phone number
- Profile information, such as name, social media account information, and profile image
- User-generated content, including comments, GIFs and virtual item voice stories that you choose to upload or broadcast on the Platform (“User Content”)
- Payment information, such as PayPal or other third-party payment information (where required for the purpose of payment)
- Your phone and social network contacts, with your permission. If you choose to find other users through your phone contacts, we will access and collect the names and phone numbers and match that information against existing users of the Platform. If you choose to find other users through your social network contacts, we will collect your public profile information as well as names and profiles of your social contacts
- Your opt-in choices and communication preferences
- Information to verify an account
- Information in correspondence you send to us
- Information you share through surveys or your participation in challenges, sweepstakes, or contests such as your gender, age, likeness, and preferences.

Information we obtain from other sources

We may receive the information described in this Privacy Policy from other sources, such as:

Social Media. if you choose to link or sign up using your social network (such as Facebook, Twitter, Instagram, VK, or Google), we may collect information from these social media services, including your contact lists for these services and information relating to your use of the Platform in relation to these services.

Third-Party Services. We may collect information about you from third-party services, such as advertising partners and analytics providers.

Others Users of the Platform. Sometimes other users of the Platform may provide us information about you, including through customer service inquiries.

Other Sources. We may collect information about you from other publicly available sources.

Information we collect automatically

We automatically collect certain information from you when you use the Platform, including internet or other network activity information such as your IP address, geolocation-related data (as described below), unique device identifiers, browsing and search history (including content you have viewed in the Platform), and Cookies (as defined below).

Usage Information

We collect information regarding your use of the Platform and any other User Content that you generate through and broadcast on our Platform. We also link your subscriber information with your activity on our Platform across all your devices using your email, phone number, or similar information.

Device Information

We collect information about the device you use to access the Platform, including your IP address, unique device identifiers, model of your device, your mobile carrier, time zone setting, screen resolution, operating system, app and file names and types, keystroke patterns or rhythms, and platform.

Location data

We collect information about your location, including location information based on your SIM card and/or IP address. With your permission, we may also collect Global Positioning System (GPS) data.

Messages

We collect and process, which includes scanning and analyzing, information you provide in the context of composing, sending, or receiving messages through the Platform's messaging functionality. That information includes the content of the message and information about when the message has been sent, received and/or read, as well as the participants of the communication. Please be aware that messages sent to other users of the Platform will be accessible by those users and that we are not responsible for the manner in which those users use or disclose messages.

Metadata

When you upload User Content, you automatically upload certain metadata that is connected to the User Content. Metadata describes other data and provides information about your User Content that will not always be evident to the viewer. In connection with your User Content the metadata can describe how, when, and by whom the piece of User Content was collected and how that content is formatted. It also includes information, such as your account name, that enables other users to trace back the User Content to your user account. Additionally, metadata will consist of data that you chose to provide with your User Content, e.g. any hashtags used to mark keywords to the audio and captions.

Cookies

We and our service providers and business partners use cookies and other similar technologies (e.g. web beacons, flash cookies, etc.) ("Cookies") to automatically collect information, measure and analyze which web pages you click on and how you

use the Platform, enhance your experience using the Platform, improve the Platform, and provide you with targeted advertising on the Platform and elsewhere across your different devices. Cookies are small files which, when placed on your device, enable the Platform to provide certain features and functionality. Web beacons are very small images or small pieces of data embedded in images, also known as “pixel tags” or “clear GIFs,” that can recognize Cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device. To learn how to disable Cookies, see the “Your choices” section below.

Additionally, we allow these service providers and business partners to collect information about your online activities through Cookies. We and our service providers and business partners link your contact or subscriber information with your activity on our Platform across all your devices, using your email or other log-in or device information. Our service providers and business partners may use this information to display advertisements on our Platform and elsewhere online and across your devices tailored to your interests, preferences, and characteristics. We are not responsible for the privacy practices of these service providers and business partners, and the information practices of these service providers and business partners are not covered by this Privacy Policy.

We may aggregate or de-identify the information described above. Aggregated or de-identified data is not subject to this Privacy Policy.

How we use your information

As explained below, we use your information to fulfill and enforce our [Terms of Use](#), to improve and administer the Platform, and to allow you to use its functionalities. We may also use your information to, among other things, show you suggestions, promote the Platform, and customize your ad experience.

We generally use the information we collect:

- to fulfill requests for products, services, Platform functionality, support and information for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes and to solicit your feedback
- to customize the content you see when you use the Platform. For example, we may provide you with services based on the country settings you have chosen or show you content that is similar to content that you liked or interacted with
- to send promotional materials from us or on behalf of our affiliates and trusted third parties
- to improve and develop our Platform and conduct product development
- to measure and understand the effectiveness of the advertising we serve to you and others and to deliver targeted advertising
- to make suggestions and provide a customized ad experience
- to support the social functions of the Platform, including to permit you and other users to connect with each other through the Platform and for you and other users to share, download, and otherwise interact with User Content posted through the Platform
- to use User Content as part of our advertising and marketing campaigns to promote the Platform
- to understand how you use the Platform, including across your devices
- to infer additional information about you, such as your age, gender, and interests
- to help us detect abuse, fraud, and illegal activity on the Platform
- to ensure that you are old enough to use the Platform (as required by law)
- to communicate with you, including to notify you about changes in our services
- to announce you as a winner of our contest, sweepstakes, or promotions if permitted by the promotion rule, and to send you any applicable prizes
- to enforce our terms, conditions, and policies
- consistent with your permissions, to provide you with location-based services, such as advertising and other personalized content
- to inform our algorithms
- to combine all the information we collect or receive about you for any of the foregoing purposes
- for any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

How we share your information

We are committed to maintaining your trust, and while AnyVoice does not sell personal information to third parties, we want you to understand when and with whom we may share the information we collect for business purposes.

Service Providers and Business Partners

We share the categories of personal information listed above with service providers and business partners to help us perform business operations and for business purposes, including research, payment processing and transaction fulfillment, database maintenance, administering contests and special offers, technology services, deliveries, email deployment, advertising, analytics, measurement, data storage and hosting, disaster recovery, search engine optimization, marketing, and data processing.

Within Our Corporate Group

We may share your information with a parent, subsidiary, or other affiliate of our corporate group.

In Connection with a Sale, Merger, or Other Business Transfer

We may share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.

For Legal Reasons

We may disclose your information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims, or government inquiries, and to protect and defend the rights, interests, safety, and security of AnyVoice Inc., the Platform, our affiliates, users, or the public. We may also share your information to enforce any terms applicable to the Platform, to exercise or defend any legal claims, and comply with any applicable law.

With Your Consent

We may share information for other purposes pursuant to your consent or with your further direction.

If you access third-party services, such as Facebook, Google, or Twitter, to login to the Platform or to share information about your usage on the Platform with others, these third-party services may be able to collect information about you, including information about your activity on the Platform, and they may notify your connections on the third-party services about your use of the Platform, in accordance with their privacy policies.

If you choose to engage in public activities on the Platform, you should be aware that any information you share may be read, collected, or used by other users. You should use caution in disclosing personal information while engaging. We are not responsible for the information you choose to submit.

Your Rights

You may submit a request to access or delete the information we have collected about you by sending your request to us at the email or physical address provided in the Contact section at the bottom of this policy. We will respond to your request consistent with applicable law and subject to proper verification. And we do not discriminate based on the exercise of any privacy rights that you might have.

Your Choices

- You may be able to refuse or disable Cookies by adjusting your browser settings. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of Cookies. For example, due to differences in how browsers and mobile apps function, you may need to take different steps to disable Cookies used for targeted advertising in a browser and to disable targeted advertising for a mobile application, which you may control through your device settings or mobile app permissions. In addition, your choice to disable cookies is specific to the particular browser or device

that you are using when you disable cookies, so you may need to separately disable cookies for each type of browser or device. If you choose to refuse, disable, or delete Cookies, some of the functionality of the Platform may no longer be available to you. Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information.

- You can manage third-party advertising preferences for some of the third parties we work with to serve advertising across the Internet by clicking here and by utilizing the choices available at www.networkadvertising.org/managing/opt_out.asp and www.aboutads.info/choices.
- Your mobile device may include a feature that allows you to opt out of some types of targeted advertising ("Limit Ad Tracking" on iOS and "Opt out of Interest-Based Ads" on Android).
- You can opt out of marketing or advertising emails by utilizing the "unsubscribe" link or mechanism noted in marketing or advertising emails.
- You can switch off GPS location information functionality on your mobile device if you do not wish to share GPS information.
- If you have registered for an account you may access, review, and update certain personal information that you have provided to us by logging into your account and using available features and functionalities.
- Some browsers transmit "do-not-track" signals to websites. Because of differences in how browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

Security

We use reasonable measures to help protect information from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

Children

The privacy of users under the age of 13 (“Younger Users”) is important to us. We provide a separate experience for Younger Users in the United States on the Children’s Platform, in which we collect only limited information. For more information on our United States data collection practices for Younger Users, please visit the [Privacy Policy for Younger Users](#).

The Platform otherwise is not directed at children under the age of 13. If we become aware that personal information has been collected on the Platform from a person under the age of 13 we will delete this information and terminate the person’s account. If you believe that we have collected information from a child under the age of 13 on the Platform, please contact us at support@anyvoice.ru.

Other Rights

Sharing for Direct Marketing Purposes (Shine the Light)

If you are a California resident, once a calendar year, you may be entitled to obtain information about personal information that we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information, as well as the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year. To request a notice, please submit your request to support@anyvoice.ru.

Content Removal for Users Under 18

Users of the Platform who are California residents and are under 18 years of age may request and obtain removal of User Content they posted by emailing us at support@anyvoice.ru. All requests must be labeled "California Removal Request" on the email subject line. All requests must provide a description of the User Content you want removed and information reasonably sufficient to permit us to locate that User Content. We do not accept California Removal Requests via postal mail,

telephone, or facsimile. We are not responsible for notices that are not labeled or sent properly, and we may not be able to respond if you do not provide adequate information. Please note that your request does not ensure complete or comprehensive removal of the material. For example, materials that you have posted may be republished or reposted by another user or third party.

Changes

We may update this Privacy Policy from time to time. When we update the Privacy Policy, we will notify you by updating the “Last Updated” date at the top of this policy and posting the new Privacy Policy and providing any other notice required by applicable law. We recommend that you review the Privacy Policy each time you visit the Platform to stay informed of our privacy practices.

Contact

Questions, comments and requests regarding this policy should be addressed to:

- Email Address: support@anyvoice.ru

Privacy Policy

(If you are a user having your usual residence in the EEA and Switzerland)

Last updated: November 2020

Welcome to AnyVoice (the “**Platform**”). The **Platform** is provided and controlled by AnyVoice Inc. or AnyVoice Pte. Ltd. (“**AnyVoice**”, “**we**” or “**us**”).

We are committed to protecting and respecting your privacy. This policy sets out the basis on which we process any personal data we collect from you, or that you provide to us. If you do not agree with this policy, you should not use the Platform.

If you have any questions about how we use your personal data, please contact support@anyvoice.ru.

To see the full Privacy Policy, [click here](#).

SUMMARY

What information do we collect about you?

We collect and process information you give us when you create an account and upload content to the Platform. This includes technical and behavioural information about your use of the Platform. We also collect information about you if you download the app and interact with the Platform without creating an account. For more information, [click here](#).

How will we use the information about you?

We use your information to provide the Platform to you and to improve and administer it. Where it is in our legitimate interests, we use your information to, among other things, improve and develop the Platform and ensure your safety. In each case where we have your consent, we will also use your personal information to serve you targeted advertising and promote the platform. For more information, [click here](#).

Who do we share your information with?

We share your data with third party service providers who help us to deliver the Platform including cloud storage providers. We also share your information with business partners, other companies in the same group as AnyVoice Inc, content moderation services, measurement providers, advertisers and analytics providers. Where required by law, we will share your information with law enforcement agencies or regulators and with third parties pursuant to a legally binding court order. For more information, [click here](#).

Your Rights

In certain circumstances, you have rights in relation to your information such as the right to deletion, the right to access and the right of portability. For more information, [click here](#).

How long do we keep hold of your information?

We retain your information for as long as it is necessary to provide you with the service so that we can fulfil our contractual obligations and rights in relation to the information involved. Where we do not need your information in order to provide the service to you, we retain it only as long as we have a legitimate business purpose in keeping such data or where we are subject to a legal obligation to retain the data.

We will also retain your data if necessary for the establishment, exercise or defence of legal claims. For more information, click [here](#).

How will we notify you of any changes to this Privacy Policy?

We will generally notify all users of any material changes to this policy through a notice on our Platform. However, you should look at this policy regularly to check for any changes. We will also update the “Last Updated” date at the top of this policy, which reflects the effective date of such policy. By accessing or using the Platform, you acknowledge that you have read this policy and that you understand your rights in relation to your personal data and how we will collect, use and process it. For more information, click [here](#).

1. The types of personal data we use

We collect and use the following information about you:

Your Profile Information. You give us information when you register on the Platform, including your username, date of birth, email address and/or telephone number, information you disclose in your user profile and your photograph or profile audio.

User Content and Behavioural Information. We process the content you generate on the Platform, including preferences you set (such as choice of language), photographs and audios you upload and comments you make (“User Content”). We collect information through surveys, challenges and competitions in which you participate. We also collect information regarding your use of the Platform, e.g. how you engage with the Platform, including how you interact with content we show to you, the ads you view, audios you watch and problems encountered, the content you like, the content you save to ‘My Favourites’ and the users you follow. We also infer your preferences, including your interests, gender and age for the purpose of personalising content. We process information about your followers, the likes you receive and responses to content you upload, for the purposes of promoting your content to other users and exploring whether your profile presents further opportunities for collaboration. If you have consented, we will use this information for the purpose of serving personalised advertising. We will also process your personal data in order to tell you about services and opportunities.

Information from Third Parties. You may choose to share certain data with us from third parties or through your use of the Platform, we may collect such third party data automatically. We have set out further detail on the information we receive from third parties below:

Business Partners

If you choose to register to use the Platform using your social network account details (e.g. Facebook, Twitter, Instagram, Google), you will provide us or allow your social network to provide us with your username and public profile. We will likewise share certain information with the relevant social network such as your app ID, access token and the referring URL. For further information on sharing your Facebook contact list with us, please see [Find other users and invite your friends](#).

Advertisers and Advertising Networks

We use the information collected from you, and your interaction with the Platform and other third party sites, to infer your likely interests to provide you with more relevant advertising. This information tells us about websites you've visited, apps you've downloaded and purchases you have made so that we can predict what else might interest you in the future and assess how effective the advertising on our Platform is. We collect this information by the use of Cookies and similar technologies on our App and from similar information received from third parties who advertise on our Platform and whose sites you visit.

Technical Information we collect about you. We automatically collect certain information from you when you use the Platform including when you are using the App without an account. Such information includes your IP address, browsing history (i.e. the content you have viewed on the Platform), mobile carrier, time zone settings, identifier for advertising purposes and the version of the app you are using. We will also collect information regarding the device you are using to access the Platform such as the model of your device, the device system, network type, device ID, your screen resolution and operating system. Where you log-in from multiple devices, we will be able to use your profile information to identify your activity across devices.

Location. We use the 'Region' you select in Settings to customise your AnyVoice experience. When you use the Platform on a mobile device, we will collect information about your location. In certain jurisdictions, with your permission, we will collect Global Positioning System (GPS) data and mobile device location information. If you do not wish to share your precise location with us, you can switch off location services via the settings on your mobile device.

Find other users and invite your friends. You can choose whether to find other users of the Platform using our 'Find Friends' function. This functionality allows you to see which of your friends from either your telephone's contact list or Facebook friends list is using the Platform and offers you the option to follow them. You can also use this function to invite your contacts to join you on the Platform. We will use the contact information you have for that person, either from within your telephone's contact list or Facebook friends list and give you the option to send them either an

SMS, email or third party message (such as Whatsapp, Facebook (including Facebook Messenger) or Twitter) inviting them to view your AnyVoice profile.

2. Cookies

We use cookies and other similar technologies (e.g. pixels etc.) (“**Cookies**”) to enhance your experience using the Platform. Cookies are used to collect information, including personal data, from you. Cookies are small files which, when placed on your device, enable us to provide certain features and functionality.

3. How we use your personal data

We will use the information we collect about you in the following ways:

- In accordance with, and to perform our contract with you, we will use your information to:
 - notify you about changes to our service;
 - provide you with user support;
 - enforce our terms, conditions and policies;
 - administer the Platform including troubleshooting;
 - personalise the content you receive and provide you with tailored content that will be of interest to you;
 - enable you to share User Content and interact with other users;
 - enable our messenger service to function if you choose to use this function;
 - enable you to participate in the virtual items program; and
 - communicate with you.
- In order to comply with our legal obligations, we use your data to help us detect abuse, fraud and illegal activity on the Platform;
- In accordance with our legitimate interests to provide an effective and dynamic Platform, we will use your information to:
 - ensure your safety and security including reviewing user content, messages and associated metadata for breach of our Community Guidelines and other inappropriate content;
 - ensure content is presented in the most effective manner for you and your device;
 - improve, promote and develop the Platform and promote popular topics, hashtags and campaigns on the Platform;
 - carry out data analysis and test the Platform to ensure its stability and security;
 - allow you to participate in interactive features of the Platform;
 - to enable you to socialise on the Platform, for example, by allowing other users to identify you via the "Find other friends" function or through their phone contacts;

- to ensure that you are old enough to use our Platform (as required by law).
- With your consent, we will use your information to:
 - provide you with personalised advertising.
 - provide you with location-based services (where those services are available in your jurisdiction and you choose to share your precise location with us).

4. How we share your personal data

We share your data with the following selected third parties:

Business Partners

If you choose to register to use the Platform using your social network account details (e.g. Facebook, Twitter, Instagram, Google), you will provide us or allow your social network to provide us with your username and public profile. We will likewise share certain information with the relevant social network such as your app ID, access token and the referring URL.

Where you opt to share content on social media platforms, the audio, username and accompanying text will be shared on that platform or, in the case of sharing via instant messaging platforms such as Whatsapp, a link to the content will be shared.

Payment Providers

If you choose to buy a subscription on our Platform, we will share data with the relevant payment provider to facilitate this transaction. We share a transaction ID to enable us to identify you and credit your account with the correct value in coins once you have made the payment.

Service Providers

We provide information and content to service providers who support our business, such as cloud service providers and providers of content moderation services to ensure that the Platform is a safe and enjoyable place.

Analytics providers

We use analytics providers to help us in the optimisation and improvement of the Platform. Our third party analytics providers also help us serve targeted adverts (if you have chosen to receive personalized advertising from us and/ or our partners).

Advertisers and Advertising Networks

We share information with advertisers and third party measurement companies to show how many and which users of the Platform have viewed or clicked on an advertisement. We share your device ID with measurement companies so that we can link your activity on the Platform with your activity on other websites; we then use this information to show you adverts which may be of interest to you.

Our Corporate Group

We may also share your information with other members, subsidiaries, or affiliates of our corporate group, to provide the Platform including improving and optimising the Platform, preventing illegal use and supporting users.

Law Enforcement

We will share your information with law enforcement agencies, public authorities or other organisations if legally required to do so, or based on our legitimate business interests if such use is reasonably necessary to:

- comply with legal obligation, process or request;
- enforce our [Terms of Use](#) and other agreements, policies, and standards, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

Public Profiles

Please note that if your profile is public, your content will be visible to anyone on the Platform and may also be accessed or shared by your friends and followers as well as third parties such as search engines, content aggregators and news sites. You can change who can see a audio each time you upload a audio. Alternatively, you can change your profile to default private by changing your settings to 'Private Account' in 'Manage my account' settings.

Sale or Merger

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets (whether a result of liquidation, bankruptcy or otherwise), in which case we will disclose your data to the prospective seller or buyer of such business or assets; or
- if we sell, buy, merge, are acquired by, or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets.

5. Where we store your personal data

The personal data that we collect from you will be transferred to, and stored at, a destination outside of the European Economic Area ("**EEA**").

Where we transfer your personal data to countries outside the EEA, we do so under the Commission's model contracts for the transfer of personal data to third countries (i.e. standard contractual clauses) pursuant to 2004/915/EC or 2010/87/EU (as appropriate). For a copy of these Standard Contractual Clauses, please contact us at support@anyvoice.ru.

6. Your Rights

You have the following rights:

- The right to request free of charge (i) confirmation of whether we process your personal data and (ii) access to a copy of the personal data retained;
- The right to request proper rectification or removal of your personal data or restriction of the processing of your personal data;
- Where processing of your personal data is either based on your consent or necessary for the performance of a contract with you and processing is carried out by automated means, the right to receive the personal data concerning you in a structured, commonly used and machine-readable format or to have your personal data transmitted directly to another company, where technically feasible (data portability);
- Where the processing of your personal data is based on your consent, the right to withdraw your consent at any time without impact to data processing activities that have taken place before such withdrawal;
- The right not to be subject to any automatic individual decisions, including profiling, which produces legal effects on you or similarly significantly affects you unless we have your consent, this is authorised by Union or Member State law or this is necessary for the performance of a contract;
- The right to object to processing if we are processing your personal data on the basis of our legitimate interest unless we can demonstrate compelling legitimate grounds which may override your right. If you object to such processing, we ask you to state the grounds of your objection in order for us to examine the processing of your personal data and to balance our legitimate interest in processing and your objection to this processing;
- The right to object to processing your personal data for direct marketing purposes; and
- The right to lodge complaints before the competent data protection regulator.

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

Please send an email to us if you would like to exercise any of your rights support@anyvoice.ru.

7. The security of your personal data

We take steps to ensure that your information is treated securely and in accordance with this policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, for example, by encryption, we cannot guarantee the security of your information transmitted via the Platform; any transmission is at your own risk.

We have appropriate technical and organizational measures to ensure a level of security appropriate to the risk of varying likelihood and severity for the rights and freedoms of you and other users. We maintain these technical and organizational measures and will amend them from time to time to improve the overall security of our systems.

We will, from time to time, include links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

8. How long we keep your personal data

We retain your information for as long as it is necessary to provide you with the service so that we can fulfil our contractual obligations and rights in relation to the information involved. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for longer in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Platform, we store your information in an aggregated and anonymised format.

9. Information relating to children

AnyVoice is not directed at children under the age of 13. If you believe that we have personal data about or collected from a child under the relevant age, please contact us at support@anyvoice.ru.

10. Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at support@anyvoice.ru and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the relevant data protection authority.

11. Changes

We will generally notify all users of any material changes to this policy, through a notice provided via the Platform. However, you should look at this policy regularly to check for any changes. We will also update the “Last Updated” date at the top of this policy, which reflects the effective date of such policy. Your continued access to or use of the Platform after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop accessing or using the Platform.

12. Contact

Questions, comments and requests regarding this policy should be addressed to support@anyvoice.ru.

Privacy Policy

(If you are not in the US, EEA or Switzerland)

Last updated: November 2020

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If you have any questions about how we use your personal data, please contact support@anyvoice.ru.

SUMMARY

What information do we collect about you?

We collect and process information you give us when you create an account and upload content to the Platform. This includes technical and behavioural information about your use of the Platform. We also collect information about you if you download the app and interact with the Platform without creating an account.

How will we use the information about you?

We use your information to provide the Platform to you and to improve and administer it. We use your information to, among other things, show you suggestions in the 'For You' feed, improve and develop the Platform and ensure your safety. Where appropriate, we will also use your personal information to serve you targeted advertising and promote the Platform.

Who do we share your information with?

We share your data with third party service providers who help us to deliver the Platform, such as cloud storage providers. We also share your information with business partners, other companies in the same group as AnyVoice, content moderation services, measurement providers, advertisers, and analytics providers. Where and when required by law, we will share your information with law enforcement agencies or regulators, and with third parties pursuant to a legally binding court order.

How long do we keep hold of your information?

We retain your information for as long as it is necessary to provide you with the service. Where we do not need your information in order to provide the service to you, we retain it only as long as we have a legitimate business purpose in keeping such data or where we are subject to a legal obligation to retain the data. We will also retain your data if we believe it is or will be necessary for the establishment, exercise or defence of legal claims.

How will we notify you of any changes to this Privacy Policy?

We will generally notify all users of any material changes to this policy through a notice on our Platform. However, you should look at this policy regularly to check for any changes. We will also update the "Last Updated" date at the top of this policy, which reflects the effective date of such policy. By accessing or using the Platform,

you acknowledge that you have read this policy and that you understand your rights in relation to your personal data and how we will collect, use and process it.

1. The types of personal data we use

We collect and use the following information about you:

Your Profile Information. You give us information when you register on the Platform, including your username, date of birth (where applicable), email address and/or telephone number, information you disclose in your user profile, and your photograph or profile audio.

User Content and Behavioural Information. We process the content you generate on the Platform, including preferences you set (such as choice of language), photographs and audios you upload and comments you make (“**User Content**”). In order to improve the upload speed of User Content before clicking “Post” to confirm the upload, we will provide a preload service to upload audio and audio in advance. If you cancel or fail to upload the content for other reasons, we will delete the associated audio and audio from our server. We collect information through surveys, challenges and competitions in which you participate. We also collect information regarding your use of the Platform, e.g., how you engage with the Platform, including how you interact with content we show to you, the ads you view, audios you watch and problems encountered, the content you like, the content you save to ‘My Favourites’ and the users you follow. We also infer your preferences, including your interests, gender and age for the purpose of personalising content. We process information about your followers, the likes you receive and responses to content you upload, for the purposes of promoting your content to other users and exploring whether your profile presents further opportunities for collaboration. Where appropriate, we will also use this information for the purpose of serving personalised advertising and to tell you about new services and opportunities.

Information from Third Parties. You may choose to share certain data with us from third parties or through your use of the Platform, we may collect such third party data automatically. We have set out further detail on the information we receive from third parties below:

Business Partners

If you choose to register to use the Platform using your social network account details (e.g., Facebook, Twitter, Instagram, Google), you will provide us or allow your social network to provide us with your username and public profile. We will likewise

share certain information with your social network such as your app ID, access token and the referring URL. For further information on sharing your Facebook contact list with us, please see [Find other users and invite your friends](#).

Advertisers and Advertising Networks

We use the information collected from you, and your interaction with the Platform and other third party sites, to infer your likely interests to provide you with more relevant advertising. This information tells us about websites you've visited, apps you've downloaded and purchases you have made so that we can predict what else might interest you in the future and assess how effective the advertising on our Platform is. We collect this information by the use of Cookies and similar technologies on our App and from similar information received from third parties who advertise on our Platform and whose sites you visit.

Technical Information we collect about you. We automatically collect certain information from you when you use the Platform including when you are using the App without an account. Such information includes your IP address, browsing history (i.e. the content you have viewed on the Platform), mobile carrier, time zone settings, identifier for advertising purposes and the version of the app you are using. We will also collect information regarding the device you are using to access the Platform such as the model of your device, the device system, network type, device ID, your screen resolution and operating system. Where you log-in from multiple devices, we will be able to use your profile information to identify your activity across devices.

Location. We use the 'Region' you select in Settings to customise your AnyVoice experience except where we provide location-based services, in which case we collect GPS (where we have your consent).

Find other users and invite your friends. You can choose whether to find other users of the Platform using our 'Find Friends' function. This functionality allows you to see which of your friends from either your telephone's contact list or Facebook friends list is using the Platform and offers you the option to follow them. You can also use this function to invite your contacts to join you on the Platform. We will use the contact information you have for that person, either from within your telephone's contact list or Facebook friends list and give you the option to send them either an SMS, email or third party message (such as Whatsapp, Facebook (including Facebook Messenger) or Twitter) inviting them to view your AnyVoice profile.

Buy coins. Your purchase will be made via your Apple iTunes or Google Play account. We do not collect any financial or billing information from you in relation to such a transaction. Please review the relevant app store's terms and notices in respect of the handling of such data. So that we can credit your account with the

correct value in coins, we keep a record of the purchases you make, the time at which you make those purchases and the amount spent.

2. Cookies

We and our vendors and service providers use cookies and other similar technologies (e.g., web beacons, flash cookies, etc.) (“Cookies”) to automatically collect information, measure and analyze which web pages you click on and how you use the Platform, enhance your experience using the Platform, improve our services, and provide you with targeted advertising on the Platform and elsewhere across your different devices. Cookies are small files which, when placed on your device, enable the Platform to provide certain features and functionality. Web beacons are very small images or small pieces of data embedded in images, also known as “pixel tags” or “clear GIFs,” that can recognize Cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device.

Additionally, we allow our business partners, advertising networks, and other advertising vendors and service providers (including analytics vendors and service providers) to collect information about your online activities through Cookies. We link your contact or subscriber information with your activity on our Platform across all your devices, using your email or other log-in or device information. These third parties may use this information to display advertisements on our Platform and elsewhere online tailored to your interests, preferences, and characteristics. We are not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Privacy Policy.

You may be able to refuse or disable Cookies by adjusting your browser settings. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of Cookies. For example, due to differences in how browsers and mobile apps function, you may need to take different steps to opt out of Cookies used for targeted advertising in a browser and to opt out of targeted advertising for a mobile application, which you may control through your device settings or mobile app permissions. In addition, your opt-out selection is specific to the particular browser or device that you are using when you opt out, so you may need to opt-out separately for each browser or device. If you choose to refuse, disable, or delete Cookies, some of the functionality of the Platform may no longer be available to you.

3. How we use your personal data

We will use the information we collect about you in the following ways:

- notify you about changes to our service;
- provide you with user support;
- personalise the content you receive and provide you with tailored content that will be of interest to you;
- enable you to share User Content and interact with other users;
- enable our messenger service to function if you choose to use this function;
- enable you to participate in the virtual items program;
- communicate with you;
- to help us detect and combat abuse, harmful activity, fraud, spam, and illegal activity on the Platform;
- ensure your safety and security including reviewing user content, messages and associated metadata for breach of our Community Guidelines and other inappropriate content;
- ensure content is presented in the most effective manner for you and your device;
- improve, promote and develop the Platform and promote popular topics, hashtags and campaigns on the Platform;
- carry out data analysis and test the Platform to ensure its stability and security;
- allow you to participate in interactive features of the Platform;
- to enable you to socialise on the Platform, for example, by allowing other users to identify you via the "Find other friends" function or through their phone contacts;
- to ensure that you are old enough to use our Platform (as required by law).
- provide you with personalised advertising;
- provide you with location-based services (where those services are available in your jurisdiction);
- enforce our terms, conditions and policies; and
- administer the Platform including troubleshooting.

4. How we share your personal data

We share your data with the following selected third parties:

Business Partners

If you choose to register to use the Platform using your social network account details (e.g., Facebook, Twitter, Instagram, Google), you will provide us or allow your social network to provide us with your username and public profile. We will likewise share certain information with the relevant social network such as your app ID, access token and the referring URL.

Where you opt to share content on social media platforms, the audio, username and accompanying text will be shared on that platform or, in the case of sharing via instant messaging platforms such as Whatsapp, a link to the content will be shared.

Payment Providers

If you choose to Buy Coins, we will share data with the relevant payment provider to facilitate this transaction. We share a transaction ID to enable us to identify you and credit your account with the correct value in coins once you have made the payment.

Service Providers

We provide information and content to service providers who support our business, such as cloud service providers and providers of content moderation services to ensure that the Platform is a safe and enjoyable place.

Analytics providers

We use analytics providers to help us in the optimisation and improvement of the Platform. Our third party analytics providers also help us serve targeted adverts

Advertisers and Advertising Networks

We share information with advertisers and third party measurement companies to show how many and which users of the Platform have viewed or clicked on an advertisement. We share your device ID with measurement companies so that we can link your activity on the Platform with your activity on other websites; we then use this information to show you adverts which may be of interest to you.

Our Corporate Group

We may also share your information with other members, subsidiaries, or affiliates of our corporate group, to provide the Platform including improving and optimising the Platform, preventing illegal use and supporting users.

Law Enforcement

We will share your information with law enforcement agencies, public authorities or other organisations if legally required to do so, or if such use is reasonably necessary to:

- comply with legal obligation, process or request;
- enforce our [Terms of Use](#) and other agreements, policies, and standards, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or

- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

Public Profiles

Please note that if your profile is public, your content will be visible to anyone on the Platform and may also be accessed or shared by your friends and followers as well as third parties such as search engines, content aggregators and news sites. You can change who can see a audio each time you upload a audio. Alternatively, you can change your profile to default private by changing your settings to 'Private Account' in “Manage my account” settings.

Sale or Merger

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets (whether a result of liquidation, bankruptcy or otherwise), in which case we will disclose your data to the prospective seller or buyer of such business or assets; or
- if we sell, buy, merge, are acquired by, or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets.

5. Where we store your personal data

The personal data we collect from you may be stored on a server located in Europe, outside of the country where you live. We maintain major servers around the world to bring you our services globally and continuously.

6. Your Choices

You can access and edit most of your profile information by signing into AnyVoice. You can delete the User Content you uploaded. We also provide a number of tools in Settings that allow you to control, among others, who can view your audios, send you messages, or post comments to your audios. Should you choose to do so, you may delete your entire account in Settings. If you have any questions on how to use those tools, or want to know about any rights you may have in the country where you live, please contact us at support@anyvoice.ru.

7. The security of your personal data

We take steps to ensure that your information is treated securely and in accordance with this policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will protect your personal data, for example, by encryption, we cannot guarantee the security of your information transmitted via the Platform; any transmission is at your own risk.

We have appropriate technical and organizational measures to ensure a level of security appropriate to the risk of varying likelihood and severity for the rights and freedoms of you and other users. We maintain these technical and organizational measures and will amend them from time to time to improve the overall security of our systems.

We will, from time to time, include links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

8. How long we keep your personal data

We retain your information for as long as it is necessary to provide you with the service. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for longer in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Platform, we store your information in an aggregated and anonymised format.

9. Information relating to children

AnyVoice is not directed at children under the age of 13. In certain cases this age may be higher due to local regulatory requirements, please see your local privacy policy for more information. If you believe that we have personal data about or collected from a child under the relevant age, please contact us at support@anyvoice.ru.

10. Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at support@anyvoice.ru and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the relevant data protection authority.

11. Changes

We will generally notify all users of any material changes to this policy, through a notice provided via the Platform. However, you should look at this policy regularly to check for any changes. We will also update the “Last Updated” date at the top of this policy, which reflects the effective date of such policy. Your continued access to or use of the Platform after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop accessing or using the Platform.

12. Contact

Questions, comments and requests regarding this policy should be addressed to support@anyvoice.ru.

Supplemental Terms – Jurisdiction-Specific

In the event of a conflict between the provisions of the Supplemental Terms – Jurisdiction-Specific that are relevant to your jurisdiction from which you access or use the Services, and the rest of policy, the relevant jurisdictions’ Supplemental Terms – Jurisdiction-Specific will supersede and control.

India. AnyVoice is our brand for providing and promoting the services. When using these services from India, please accordingly read “**AnyVoice**”, “**we**” or “**us**” in this policy.

Indonesia. If you are using our services in Indonesia, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall apply.

Age, Parental and Guardian Consent. By accessing and/or using this Platform, you represent that you are at least 21 years of age or married or not under guardianship. If you are below 21 years old and you are not married, or under guardianship:

- you must obtain approval from your parent(s) or legal guardian(s); and
- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Platform; (ii) your compliance with this policy; and (iv) ensuring that any of your participation in the Platform will not, in any event, result in any violation of applicable laws and regulations relating to child protections.

If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or guardian(s) is not willing to open the account under their name, you must cease accessing the Platform.

Your Choices. You may withdraw your consent to AnyVoice's disclosure of personal data to third parties. Upon your request, we will cease to display, publish, transmit, disseminate, and/or open the access to your personal data to third parties. Please note that by withdrawing your consent to the disclosure and/or collection of your personal data, we may not be able to fulfill your requests and you may not be able to use some of AnyVoice features and functionality.

You may request AnyVoice to (i) disclose history of personal data that we have collected; and/or (ii) erase and dispose your personal data that we have collected on our server. Please note that by requesting us to erase and dispose your personal data, you may not be able to use some of AnyVoice features and functionality.

To exercise any of your rights, please contact support@anyvoice.ru

Notification. In the event of any breach of personal data, we will notify you and provide you with information regarding such breach of personal data.

Data retention. We retain your information for as long as it is necessary to provide you with the service. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for five (5) years (or longer if required) in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Platform and the five (5) years retention period has lapsed, we store your information in an aggregated and anonymised format. Non-personally identifiable information may be retained indefinitely for analytics.

Philippines. If you are using our services in Philippines, the following additional terms shall apply pursuant to the relevant laws, rules and regulations and issuances by the Philippines National Privacy Commission ("NPC") on data privacy.

Your Rights. To the extent that the relevant laws, rules and regulations on data privacy recognize your rights and freedoms as data subjects, you shall have the right to information, object, access, rectification, erasure or blocking, lodge complaints before the NPC, damages and data portability. Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

Last Updated: This Supplementary Terms of this Policy was last updated on November 15, 2020 and is effective on the same date.

Turkey. If you are using our services in Turkey, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

Purposes for the processing your personal data. Our purposes for processing your personal data categories as mentioned under “1. The types of information we collect” are; (i) complying with our legal obligations, (ii) fulfilling our obligations stemming from the Terms and Conditions, (iii) processing for all legitimate purposes including providing you the services set forth in the Terms and Conditions, (iv) complying with the retaining, reporting and notifying obligations set forth in the legislation and determined by the relevant regulatory authorities and other authorities; and all other obligations provided in the laws, (v) retaining your personal data based on the statute of limitations set out in the relevant laws and (vi) processing of your personal data which are already made public.

Your rights. According to Article 11 of the Data Protection Law, you are entitled to request the following with respect to your personal data by submitting a written request:

- to learn whether the personal data relating to you are being processed,
- if it is processed, to request information with regard to processing,
- to learn purposes of the processing and whether they are used for such purpose or not;
- to know the third persons within or outside the country to whom the personal data are transferred,
- to request correction of the personal data if the data is processed incompletely or inaccurately,
- to request deletion or destruction of the personal data under the conditions set forth in Article 7 of the Data Protection Law,
- to request notifying third persons to whom the personal data are transferred, about the processes completed within the scope of the foregoing two items,
- to object to negative consequences about you that are concluded as a result of analysis of the processed personal data exclusively by automatic means,

- to claim indemnification if the you suffered damage due to illegal processing of your personal data.

You may exercise your rights listed above by sending an e-mail to the following address: support@anyvoice.ru.

The requests found in your application will be resolved as soon as possible according to the nature of your request and within thirty days at the latest free of charge. However, if your request incurs additional cost to our company, then you may be charged over the tariff fee determined by the Turkish Personal Data Protection Board.

Language. This policy is written in the English language and Turkish language. In the event of any inconsistency or different interpretation between the English text and Turkish text, the relevant Turkish text shall prevail.

Vietnam. If you are using our services in Vietnam, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

Age, Parental and Guardian Consent. By accessing and/or using this Platform, you represent that you are at least 16 years of age or not under guardianship. If you are below 16 years old or under guardianship:

- you must obtain approval from your parent(s) or legal guardian(s); and
- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Platform; (ii) your compliance with this policy; and (iii) ensuring that any of your participation in the Platform will not, in any event, result in any violation of applicable laws and regulations relating to child protections.

If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or legal guardian(s) is not willing to open the account under their name, you must cease accessing the Platform.

Thailand. If you are using our services in Thailand, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

Age, Parental and Guardian Consent. By accessing and/or using this Platform, you represent that you are at least 20 years of age and/or legally competent under the applicable laws. If you are below 20 years old and/or not legally competent under the applicable laws:

- you must obtain approval from your parent(s) or legal guardian(s); and

- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Platform; (ii) your compliance with this policy; and (iii) ensuring that any of your participation in the Platform will not, in any event, result in any violation of applicable laws and regulations relating to child protections.

If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or legal guardian(s) is not willing to open the account under their name, you must immediately cease accessing the Platform.

United Arab Emirates. If you are using the Platform in the United Arab Emirates (“UAE”), the following additional terms apply. If any conflict arises between the main Privacy Policy and the additional terms, the following terms shall prevail:

1. How we share your personal data

In addition to the main text of this policy, by using the Platform in the UAE you agree to the terms of this Privacy Policy and consent to our sharing of your personal data in line with the main text of this Privacy Policy.

2. Governing law and dispute resolution

By using our Platform in the UAE, this Privacy Policy will be governed by and interpreted in accordance with the laws of the UAE. In the event of a dispute arising between the parties in connection with this Privacy Policy:

- where the dispute relates to a claim for a sum within the limits specified by the DIFC Small Claims Tribunal from time to time, then the dispute shall be referred by either party to the said Tribunal; and
- for all other disputes, the parties shall seek settlement of that dispute by mediation in accordance with the Mediation Rules of the DIFC-LCIA Arbitration Centre, which Rules are deemed to be incorporated by reference to this clause. If the dispute is not settled by mediation within 30 days of the commencement of the mediation, or such further period as the parties shall agree in writing, the dispute shall be referred to and finally resolved by arbitration under the Arbitration Rules of the DIFC-LCIA Arbitration Centre, which Rules are deemed to be incorporated by reference to this clause. The language to be used in the mediation and in the arbitration, shall be English. In any arbitration commenced pursuant to this clause the number of arbitrators shall be one and the arbitration shall be conducted in Dubai.

Israel. If you are using our services in Israel, the following additional terms apply.

- You declare that you are over the age of 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are

reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 13 and that you have read and acknowledged AnyVoice's Privacy Policy and Terms of Use and agree to the use by your child of the Platform and registration for an account.