frenzy

# PRIVACY POLICY

Version 1.0

Welcome to Frenzy. At Frenzy, we believe that you should be the one most empowered to make decisions regarding your personal information in order to best augment your experience on the platform. In order to do so, we believe that you should always know exactly what personal information is collected, how it is collected, and how we use it. This way, you are able to make better informed choices, while enabling us to also offer you an experience that is uniquely tailored to you.

We advise you to read the following Privacy Policy in full. However, as we understand that you do have other things to tend to, here is a summary:

1. **We collect and store some personal information about you when you use our platform. This Privacy Policy details how and why we use your personal information.**
2. **Frenzy is for friends, not followers. The photos, videos, messages, gifs and other forms of communication that you share on your account through our platform are shared only with those you wish to share them with. Nothing is made public, unless you choose to share content taken on Frenzy publicly on the platform and/or on another social media platform, or with the Frenzy team.**
3. **We may share your personal information with some of our service providers and partners, which enables us to deliver our platform to you.**
4. **You have a number of rights in respect of the personal information that we hold about you. For example, you have the right to ask us to provide a copy of it to you or to delete it from our systems.**
5. **If you have any questions about our Privacy Policy, the way in which we collect your personal information or anything else related to our privacy practices, please feel free to contact us.**

## 1. General information about this Privacy Policy

### 1.1 Who we are and how to contact us

**(a) Lapse Ltd** is the controller of your personal information (referred to as either "**Frenzy**", "**we**", "**us**" or "**our**" in this Privacy Policy). Our registered office is at Np-105, Icentre Howard Way, Newport Pagnell, Milton Keynes MK16 9PY, England.

**(b)** You can contact us by following this link.

### 1.2 Who this Privacy Policy applies to

**(a)** In order for you to experience Frenzy in the best way possible, we require certain information from you. A prime example of this is when you decide to sign up for an account with us. In order to use Frenzy, you must provide us with specific information so that we can provide our services to you.

**(b)** Once you decide to create an account on Frenzy, this Privacy Policy, alongside our Terms of Service, will govern our collection and use of your personal information, as well as your rights in relation to such information. It does not govern the use of our website, mobile apps or any other services that we may provide.

**(c)** If you are under the age of 13, you must not use Frenzy as it is not designed for you. **By creating an account or using Frenzy, you confirm that you are over the age of 13.** We do not intend to, or knowingly, collect the personal information of any individual under the age of 13. If you are a parent or guardian who is aware that your child under the age of 13 has provided us with any of their own personal information, please contact us as soon as possible so that we can ensure the prompt removal of that personal information.

### 1.3 What this Privacy Policy applies to

**(a)** This Privacy Policy describes Frenzy's privacy practices. Our platform may from time to time show content that directs you to a website or service owned and operated by third-parties. These websites and services may gather information about you and will have their own privacy policies in place. As such, it is advisable that you take a look at their privacy policies in order to understand how and what personal information they collect about you.

### 1.4 Complaints

**(a)** If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your personal information, please contact us. We will reply to your complaint as soon as we can.

**(b)** If you feel that your complaint has not been adequately resolved, please note that applicable privacy laws also give you the right to contact your local data protection authority.

## 2. What personal information we collect from you

**2.1** We collect a variety of personal information about you when you use our platform, which can be categorized as follows:

| Category | What this means |
|---|---|
| "**Identity Data**" | Your first name, last name, username or similar identifier, date of birth, gender and profile photo. |
| "**Contact Data**" | Your email address and telephone number. |

| Category | What this means |
|---|---|
| "**Location Data**" | Your approximate geographical location (if you have enabled this on your device). |
| "**Friends Data**" | The phone number of your contacts stored on your device. |
| "**Platform Data**" | Data generated through your use of our platform, including messages, photos and videos that you share or upload to the platform. This includes face-related information generated on your device from photos and videos you choose to capture or upload, such as face bounding boxes, face counts, segmentation masks and framing information used to provide camera, editing, avatar and media effects. We do not use this information to identify you, verify your identity or create biometric templates. |
| "**Transaction Data**" | Details about subscriptions and services you have purchased from us. |
| "**Device Data**" | Your Internet protocol (IP) address, login data, time zone setting and location and operating system of your device. |
| "**Usage Data**" | Details of how you use our platform. |

**2.2 You do not have to provide personal information to us**. However, there may be instances where we *need* your personal information in order to deliver our platform to you or to comply with applicable laws. In that case, we may have to restrict your access to our platform if you do not provide the relevant information. We will let you know at the relevant time if that happens.

## 3. How we use your personal information

**3.1** Under applicable privacy laws, we are only permitted to use your personal information when certain conditions apply (otherwise known as "**lawful basis**"). As such, all use of your personal information by us is justified by one of the following lawful bases:

**(a)** Where we need to use your personal information to deliver our service to you or to take a step that you have asked us to ("**Contractual Necessity**").

**(b)** Where we need to use your personal information for our legitimate interests, and your interests and fundamental rights do not override those interests ("**Legitimate Interest**").

**(c)** Where we need to use your personal information to comply with our legal or regulatory obligations ("**Compliance with Law**").

**(d)** Where we have your consent to use your personal information for a specific purpose ("**Consent**").

**3.2** We have set out below the various purposes which we use your personal information for, and the corresponding lawful bases we rely on:

| Purpose | Categories of personal information | What this means | Lawful basis |
|---|---|---|---|
| **Account creation and service delivery** | • Identity Data<br>• Contact Data<br>• Location Data<br>• Platform Data | To register your account and manage your access to our platform. | **Contractual Necessity.** |
| **Contacts sync** | • Friends Data | To allow you to find or invite your friends on/to the platform by synchronizing your contacts. | **Contractual Necessity.** |
| **Purchases** | • Transaction Data | To manage your subscription(s) and other in-app purchases. | **Contractual Necessity.** |
| **Fraud prevention** | • Identity Data<br>• Contact Data<br>• Device Data | To keep our platform and associated systems operational and secure. | **Legitimate Interest.** We have a legitimate interest in ensuring the ongoing security of our platform and associated systems. |
| **Troubleshooting** | • Device Data<br>• Usage Data | To track issues that might be occurring on our platform and resolve them. | **Legitimate Interest.** We have a legitimate interest in monitoring our platform and ensuring its proper operation. |
| **Analytics** | • Device Data<br>• Usage Data | To understand how our users use our platform, and improve it using that data. | **Legitimate Interest.** We have a legitimate interest in monitoring the use of our platform in order to improve it over time. |
| **Legal compliance** | • Identity Data<br>• Device Data | To comply with our legal and regulatory obligations (for example, by ensuring that you are allowed to use the platform). | **Compliance with Law.** |
| **Marketing** | • Identity Data<br>• Contact Data | To send you communications about the platform and other services. | **Consent.** |

**3.3** We may use automated technologies, including Artificial Intelligence (“AI”) and Machine Learning (“ML”) models, to process content you upload to the platform, including photos and videos (“Platform Data”). This processing may include tasks such as:

**(a)** Enhancing, optimizing, or improving image quality

**(b)** Tagging, categorizing, or organizing content

**(c)** Analyzing Platform Data to improve platform features and personalized experiences

**(d)** Detecting harmful or inappropriate content to maintain platform safety

**3.4** We do not use AI or ML to make solely automated decisions that legally or significantly affect you without your consent.

**3.5** We do not use your data (inclusive of your photos and videos) to train AI models.

Face data and media effects. When you use camera, editing, avatar or media effects, we may process face-related information from photos or videos on your device to detect whether a face is present, frame the image, focus and expose the camera, generate person or skin segmentation masks and render the effect you selected. This processing is used only to provide the media feature you are using. We do not use face data for facial recognition, identity verification, biometric profiling, advertising, marketing or AI model training.

We do not store or share standalone face detection results, face bounding boxes, segmentation masks or similar face-analysis data. These values are transient and are discarded after the relevant on-device processing completes. If you choose to upload, send, post or save media, we may store and share the resulting photo, video or rendered output as Platform Data in accordance with this Privacy Policy.

## 4. How long we retain your personal information

**4.1** We will store your personal information only for as long as is necessary for us to achieve the purposes set out in Section 2.2 above. We may sometimes need to retain some of your personal information for a longer period of time if that is required by applicable laws.

**4.2** Standalone face-analysis data is not retained after on-device processing. Uploaded photos, videos, messages, rendered outputs and other Platform Data are retained only as described in this section and may be deleted through the rights and account controls described in this Privacy Policy.

**4.3** At Frenzy, you have complete control over who you choose to share messages, media, and other content with. You can choose to share messages and media to your chats only, publicly with all other users of the platform, or with the Frenzy team in order to potentially be featured on our own social media pages. This is solely up to you.

## 5. Who we share your personal information with

**5.1** We may share your personal information with a number of recipients for various purposes, as detailed below:

| Recipients | Why we share it |
|---|---|
| **Our affiliates** | Other companies within our corporate group may help us provide our service to you. |
| **Our service providers** | Our service providers provide us with IT, infrastructure and other services which allow us to provide our service to you. |
| **Our professional advisers** | Our lawyers, bankers, auditors and insurers and other advisers may need to access your personal information when providing their services to us. |
| **Public authorities** | Public authorities may require us to report our data processing activities in certain circumstances, which may involve disclosing your personal information. |
| **Purchaser** | In the event we decide to sell our business to a third-party, we will need to transfer your personal information to them so that they can continue delivering the service to you seamlessly. |

**5.2** We will always ensure that any recipient of your personal information is subject to appropriate contractual provisions which guarantee the privacy and security of your personal information, in line with the requirements of applicable privacy laws.

**5.3** Please rest assured that we will **never sell your personal information to a third-party for commercial purposes**. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We do not sell or share standalone face data with third parties. Service providers may process uploaded media or rendered outputs only as needed to provide infrastructure, storage, safety, support and related services for the platform, under contractual protections.

Your personal information may be transferred to, and maintained on, servers or computers that are located outside of your country in a jurisdiction which may have different privacy laws in place, some of which may offer less protection to your personal information than in your country. Where your personal information is so transferred to a foreign country, we will comply with all applicable privacy laws designed to ensure the ongoing privacy and security of your personal information. This may involve implementing appropriate safeguards with the recipients of your personal information. Should you want to know more about these safeguards, please contact us.

## 6. How we keep your personal information secure

**6.1** We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We also limit access to your personal information to staff who have a business need to have such access. All such people are subject to a contractual duty of confidentiality.

**6.2** We have also implemented procedures to deal with any actual or suspected personal information breach. In the event of any such breach, we have systems in place to work with applicable regulators. In addition, in certain circumstances (e.g. where we are legally required to do so), we may notify you of any breach affecting your personal information.

## 7. Rights you have in relation to your personal information

**7.1** In certain circumstances, applicable privacy laws give you the following rights in respect of your personal information:

**(a) Request access to your personal information.** This enables you to receive a copy of the personal information we hold about you, and to check that we are lawfully processing it.

**(b) Request the correction of your personal information.** This enables you to have any incomplete or inaccurate information we hold about you corrected.

**(c) Request the erasure of your personal information.** This enables you to ask us to delete or remove your personal information where there is no good reason for us continuing to process it. This may not always be available (for example, we cannot delete your personal information if you wish to continue using our platform, as we need it to manage your user account).

**(d) Object to our processing of your personal information.** This right exists where we are relying on Legitimate Interest as the lawful basis for our processing, and there is something about your particular situation which makes you want to object to our processing on this ground.

**(e) Request the restriction of our processing of your personal information.** This enables you to ask us to temporarily suspend the processing of your personal information, for example if you want us to establish its accuracy or our reason for processing it.

**(f) Request the transfer of your personal information.** This enables you to ask us to provide to you, or a third-party you have chosen, your personal information in a structured, machine-readable format.

**(g) Withdraw your consent.** This enables you to withdraw your consent. This right only exists where we are relying on Consent as our lawful basis to process your personal information.

**7.2** If you want to exercise any of the rights described above, please contact us. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

**7.3** Typically, you will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may also refuse to comply with your request in limited circumstances.

**7.4** We try to respond to all legitimate requests within a month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 8. How we use cookies on your device

*What are cookies?*

**8.1** We may collect information from your device using ‘cookies’. Cookies are small data files stored on your device by a website or mobile app. We may use both session cookies (which expire once you close your web browser or mobile app) and persistent cookies (which stay on your device until you delete them) to provide you with a more personal and interactive experience on our platform.

*Cookies we use*

**8.2** Our platform uses the following types of cookies for the purposes set out below:

| Type of cookie | Purpose |
|---|---|
| **Essential cookies** | These cookies are essential to provide you access to the platform and to enable you to use some of its features. Without these cookies, the platform would not be operating correctly. |
| **Functionality cookies** | These cookies allow our platform to remember choices you make when you use it, such as remembering your language preferences or remembering your login details. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit the platform. |
| **Analytics cookies** | These cookies are used to collect information about traffic to our platform and how our users use it. The information collected is aggregated and anonymous. We use this information to help operate our platform more efficiently, to gather broad demographic information and to monitor the level of activity on our platform. |

*Disabling cookies*

**8.3** You can typically remove or reject cookies via your device or browser settings. In order to do this, follow the instructions provided by your device or browser (usually located within the ‘settings’, ‘help’, ‘tools’ or ‘edit’ facility). Many devices and browsers are set to accept cookies until you change your settings.

**8.4** If you do not accept our cookies, you may experience some inconvenience in your use of our platform. For example, we may not be able to recognize your device and you may need to log in every time you visit our platform.

**8.5** For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, please visit www.allaboutcookies.org and www.youronlinechoices.com.uk.