

IMPORTANT PRIVACY INFORMATION

In order to use the service, we will ask you to enter your gender, age category and email. We also automatically collect from your device language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and other unique identifiers (such as IDFA and AAID). We need this data to provide our services, analyze how our customers use the service, to serve ads.

For improving our service and serving ads, we use third party solutions. As a result, we may process data using solutions developed by **BigQuery, AppsFlyer, Facebook, Firestorage, Google, Amplitude, Firebase, Sendios, Snapchat, Pinterest, Tableau, Twitter, Zendesk, Hotjar, PayPal, TikTok**. Some of the data is stored and processed on servers of such third parties. This enables us to: (1) analyze different interactions (how often users make purchases, what is the average time spent by users on the website); (2) serve and measure ads (and are able to show them only to a particular group of users, for example, to users that have already visited the website). Consequently, we, in particular, better understand in what of our features and content you see the most value and are able to focus on them to enhance your experience and increase the quality of our products.

Please read our Privacy Policy below to know more about what we do with data ([Section 2](#)), what data privacy rights are available to you ([Section 5](#)), who will be the data controller ([Section 12](#)), and how to influence personalized advertising ([Subsection 2.7](#)). If any questions will remain unanswered, please contact us at contact@vodelif.ltd.

PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you use the Galas website (the “**Website**”) and the services provided through them (together with the Website, the “**Service**”), how such personal data will be used, shared.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU). If you do not agree, or are unable to make this promise, you must not use the Service. In such case, you must contact us and request deletion of your data.

Any translation from English version is provided for your convenience only. In the event of any difference in meaning or interpretation between the English language version of this Privacy Policy and any translation, the English language version will prevail. The original English text shall be the sole legally binding version.

“**GDPR**” means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“**EEA**” includes all current member states to the European Union and the European Economic Area. For the purpose of this policy EEA shall include the United Kingdom of Great Britain and Northern Ireland.

“**Process**”, in respect of personal data, includes to collect, store, and disclose to others.

TABLE OF CONTENTS

1. [CATEGORIES OF PERSONAL DATA WE COLLECT](#)
2. [FOR WHAT PURPOSES WE PROCESS PERSONAL DATA](#)
3. [UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA \(Applies only to EEA-based users\)](#)
4. [WITH WHOM WE SHARE YOUR PERSONAL DATA](#)

5. [HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS](#)
6. [AGE LIMITATION](#)
7. [INTERNATIONAL DATA TRANSFERS](#)
8. [CHANGES TO THIS PRIVACY POLICY](#)
9. [CALIFORNIA PRIVACY RIGHTS](#)
10. [DATA RETENTION](#)
11. [HOW "DO NOT TRACK" REQUESTS ARE HANDLED](#)
12. [PERSONAL DATA CONTROLLER](#)
13. [CONTACT US](#)

1. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, when you enter your name, email). We also collect data automatically (for example, your IP address). We also may receive data about you from third parties.

1.1. Data you give us

You provide us information about yourself in the process of account creation. For example: name, email address, quiz answers.

1.2. Data we collect automatically:

1.2.1.Data about how you found us

We collect data about your referring app or URL (that is, the app or place on the web where you were when you tapped on our ad).

1.2.2.Device and Location data.

We collect data from your device. Examples of such data include: language settings, IP address, time zone, type and model of a device, device settings, operating system and its version, Internet service provider, mobile carrier, hardware ID, and Facebook ID.

1.2.3.Usage data

We record how you interact with our Service. For example, we log your taps/clicks on certain areas of the interface, the features, and content you interact with, how often you use the Service, how long you are in the Service, and your purchases. We also record the ads on our Website with which you interact (and the Internet links to which those ads lead).

1.2.4.Advertising IDs

We collect your Apple Identifier for Advertising ("IDFA") or Google Advertising ID ("AAID") (depending on the operating system of your device). You can typically reset these numbers through the settings of your device's operating system (but we do not control this).

1.2.5.Transaction data

When you make payments through the Service, you need to provide financial account data, such as your credit card number, to our third-party service providers. We do not collect or store full credit card number data, though we may receive credit card-related data, data about the transaction, including: date, time and amount of the transaction, the type of payment method used.

1.2.6.Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our Service. A persistent cookie remains on your hard drive for an extended period of time. We also use tracking pixels that set cookies to assist with delivering online advertising.

Cookies are used, in particular, to automatically recognize you the next time you visit our Website. As a result, the information, which you have earlier entered in certain fields on the Website may automatically appear the next time when you use our Service. Cookie data will be stored on your device and most of the times only for a limited time period.

2. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

2.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.

To host personal data and enable our Service to operate and be distributed we use Amazon Web Services, which is a hosting and backend service.

We also use Digital Ocean, which is a hosting services provider, and Google Cloud, which is a cloud computing services provider.

To store data we may also use Firestorage. Privacy Policy.

2.2. To customize your experience

We process your personal data, such as learning preferences and goals to adjust the content of the Service and make offers tailored to your personal preferences. As a result of such processing, we will be able to provide personalized service.

2.3. To manage your account and provide you with customer support

We process your personal data to respond to your requests for technical support, service information or to any other communication you initiate. This includes accessing your account to address technical support requests. For this purpose, we may send you, for example, notifications or emails about the performance of our Service, security, payment transactions, notices regarding our Terms and Conditions of Use or this Privacy Policy.

We use Zendesk ticketing system to handle customer inquiries. When you send us inquiries via contact form or via email, we will store the details provided by you via Zendesk ticketing system, which enables us to track, prioritize and quickly solve your requests. Privacy Policy.

2.4. To communicate with you regarding your use of our Service

We communicate with you, for example, by emails. These may include, for example, emails with information about the Service.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by the Website's users, as well as when they interacted with it, such as by clicking on links included in the message.

We use Sendios, which is a marketing personalization and retention platform, to deliver tailored email messages to our users.

2.5. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Service and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what features and sections of the Website our users like more, what categories of users use our Website. As a consequence, we often decide how to improve the Website based on the results obtained from this processing.

To perform research and analysis about how users interact with our Service we use **Appsflyer**. Appsflyer enables us to understand, in particular, how users find us (for example, who was the advertiser that delivered an ad to users, which led you to our Service). Appsflyer also provides us with different analytics tools that enable us to research and analyze use of the Service. [Privacy Policy](#), [OptOut](#).

We use **Facebook Analytics**, which is a service provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, in particular, aggregated demographics and insights on how many people access the Service, how often users make purchases, and other users' interactions within the Service. [Privacy Policy](#)

To analyse how visitors use our Service and to measure effectiveness of some ads we use **Google Analytics**, a web analysis program of Google. In order to provide us with analytics, Google Analytics places cookies on your device. On Google Analytics we get, in particular, aggregated information on the data you enter on our Service and users' interactions within the Service. Google allows you to influence the collection and processing of information generated by the Google, in particular, by installing a browser plug-in, available [here](#).

We also use **Amplitude**, which is an analytics service provided by Amplitude Inc. We use this tool to understand how customers use our Service. Amplitude collects various technical information, in particular, time zone, type of device (phone or tablet), unique identifiers (such as IDFA). Amplitude also allows us to track various interactions (entering your reading goals) that occur on the Website. As a result, Amplitude helps us to decide what features should we focus on. Amplitude is [EU-US Privacy Shield certified](#). Amplitude provides more information on how they process data in its [Privacy Policy](#).

To track and analyze behavior of our Service's users (in particular, how they react to changes of the App's or Website's structure, text or any other component), we use **Firebase Remote Config**. Firebase Remote Config is an A/B testing and configuration service provided by Google. [Privacy Policy](#) and [Privacy and Security in Firebase](#).

We also use **Firebase Analytics**, which is an analytics service provided by Google. In order to understand Google's use of data, consult Google's [partner policy](#). Firebase [Privacy information](#). [Google's Privacy Policy](#).

To perform our Website analysis, we also use **Tableau**, a company providing interactive data visualization products focused on business intelligence. Tableau Software Privacy Policy.

BigQuery, an analytical service provided by Google, allows us to analyze large and complex datasets about the Website. We also use Firebase Analytics, which is an analytics service provided by Google. In order to understand Google's use of data, consult Google's partner policy.

We also use **Hotjar**, a behavior analytics tool that analyses Service use, providing feedback through tools such as heatmaps, session recordings, and surveys. Hotjar's [Privacy Policy](#).

2.6. To send you marketing communications

We process your personal data for our marketing campaigns. We may add your email address to our marketing list. As a result, you will receive information about our products, such as for example, special offers. If you do not want to receive marketing emails from us, you can unsubscribe following instructions in the footer of the marketing emails.

2.7. To personalize our ads

We and our partners, including Facebook and Google, use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you have accessed our Service, you might see ads of our products, in your Facebook's feed.

How to opt out or influence personalized advertising

iOS: On your iPhone or iPad, go to "Settings," then "Privacy" and tap "Advertising" to select "Limit Ad Track". In addition, you can reset your advertising identifier (this also may help you to see less of personalized ads) in the same section.

Android: To opt-out of ads on an Android device, simply open the Google Settings app on your mobile phone, tap "Ads" and enable "Opt out of interest-based ads". In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads).

To learn even more about how to affect advertising choices on various devices, please look at the information available [here](#).

In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- Network Advertising Initiative – <http://optout.networkadvertising.org/>
- Digital Advertising Alliance – <http://optout.aboutads.info/>
- Digital Advertising Alliance (Canada) – <http://youradchoices.ca/choices>
- Digital Advertising Alliance (EU) – <http://www.youronlinechoices.com/>
- DAA AppChoices page – <http://www.aboutads.info/appchoices>

Browsers: It is also may be possible to stop your browser from accepting cookies altogether by changing your browser's cookie settings. You can usually find these settings in the "options" or "preferences" menu of your browser. The following links may be helpful, or you can use the "Help" option in your browser.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#)

We value your right to influence the ads that you see, thus we are letting you know what service providers we use for this purpose and how some of them allow you to control your ad preferences.

We use **Facebook pixel** on the Website. Facebook pixel is a code placed on the Website collecting data that helps us track conversions from Facebook ads, build targeted audience and remarket to people who have taken some action on the Website (for example, made a purchase).

We use **Facebook Ads Manager** together with **Facebook Custom Audience**, which allows us to choose audiences that will see our ads on Facebook or other Facebook's products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the Service (for example, visited it). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook's products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience [here](#).

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go [here](#) or adjust your ads settings on [Facebook](#).

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in way that they will appear, for example, only to users that have conducted certain actions with our Service (for example, show our ads to users who have made a purchase). Some other examples of events that may be used for tailoring ads include, in particular, visiting our Service. Google allows its users to [opt out of Google's personalized ads](#) and to [prevent their data from being used by Google Analytics](#).

We also use **Snapchat Advertising Platform** together with **Snapchat Audience Based Match**, which is an ad delivery service provided by Snapchat that can link the activity of some users of our Website with the Snapchat advertising network and show some of our ads to them. As a result, you may see more of ads on Snapchat in case you use our Website. Snapchat allows you to [Opt Out](#) of their audience based ads. [Privacy Policy](#).

We also use **Twitter Ads** provided by Twitter to deliver advertising. Twitter Ads allows us to choose specific audiences based on geographic areas or user's interests. As a result, we may ask Twitter to deliver our ads to certain list of users. Twitter allows you to opt-out its internet-based advertising. [Privacy Policy](#).

We use **Pinterest Ads** to deliver group-based advertisements. For example, you may see our ads if you are interested in specific services, information, or offers. For more information, please refer to the [Pinterest Privacy Policy](#).

TikTok Ads is the service provided by TikTok that can deliver ads to its users. The ads can be tailored to specific categories of users (for instance, based on their geographical location). For more information, please refer to [TikTok's Privacy Policy](#).

2.8. To process your payments

We provide paid products and/or services within the Service. For this purpose, we use third-party services for payment processing (for example, payment processors). As a result of this processing, you will be able to make a payment for a subscription and we will be notified that the payment has been made.

We will not store or collect your payment card details ourselves. This information will be provided directly to our third-party payment processors.

We use **Solid**, which is a payment gateway service provider. To process payments we also use **PayPal**.

2.9. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

2.10. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

3. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA (Applies only to EEA-based users)

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 2. This section applies only to EEA-based users.

We process your personal data under the following legal bases:

3.1. consent

Under this legal basis we will send you marketing communications. You have the right to withdraw your consent any time by using the unsubscribe link in the footer of our emails. We will also send you push notifications if you allow us to. You can disable notifications any time in the settings of your device.

3.2. to perform our contract with you;

Under this legal basis we:

- Provide our Service (in accordance with our Terms and Conditions of Use)
- Customize your experience
- Manage your account and provide you with customer support
- Communicate with you regarding your use of our Service
- Process your payments

3.3. for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of the Website easier and more enjoyable, or to introduce and test new features).

- to personalize our ads

The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.

- to enforce our Terms and Conditions of Use and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Service, non-compliance with our Terms and Conditions of Use.

3.4. to comply with legal obligations.

4. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes indicated in Section 2 of this Privacy Policy. The types of third parties we share information with include, in particular:

4.1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We share your personal information with the following types of service providers:

- cloud storage providers (Google)
- hosting and backend services providers (Digital Ocean, Amazon)
- data analytics providers (Facebook, Google, Appsflyer, Firebase, Amplitude, BigQuery, Tableau, Hotjar)

- marketing partners (in particular, social media networks, marketing agencies, email delivery services, Facebook, Google, Snapchat, Twitter, Pinterest, TikTok)
- payment processing providers (PayPal, Solid)
- communication services providers (Sendios, Zendesk)

4.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

4.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

5. HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided on the Service.

Deleting your personal data. You can request erasure of your personal data as permitted by law.

When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use thereof.

Additional information for EEA-based users:

If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can send respective request to us as described below.

To exercise any of your privacy rights, please send a request to contact@vodelif.ltd.

6. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us at contact@vodelif.ltd.

7. INTERNATIONAL DATA TRANSFERS

We do business globally. We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available [here](#)), or (ii) the European Commission adequacy decisions about certain countries (details available [here](#)).

8. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Service or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

9. CALIFORNIA PRIVACY RIGHTS

California's Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties' direct marketing purposes. Learn more about what is considered to be [personal information under the statute](#).

To obtain this information from us, please send an email message to contact@vodelif.ltd, which includes "Request for California Shine the Light Privacy Information" on the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

10. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you), which includes (but is not limited to) the period during which you have an account with the Service. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

11. HOW "DO NOT TRACK" REQUESTS ARE HANDLED

This Service does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

12. PERSONAL DATA CONTROLLER

Vodelif Limited, a company registered and acting under the laws of the Republic of Cyprus with registration number HE 413352, having its registered address at 24 Peiraios Str., 1st floor, Strovolos, 2023 Nicosia, Cyprus, will be the controller of your personal data.

13. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at contact@vodelif.ltd.

Effective as of: 13 September 2022