

**PRIVACY NOTICE FOR DATA SUBJECTS**  
Users of FaceStar App

**according to article 13 of the Regulation (EU) 2016/679 (“GDPR”) General Data Protection Regulation**

Using “FaceStar” app, your personal data (“Data”) will be processed by Us, Visionborne Inc. (“We”, “Visionborne”, or “the Controller”), as Data Controller. We will process the Data under the principles of protection of personal data established by EU Regulation 2016/679 (“GDPR”).

You can contact Visionborne Inc. for any question regarding this Privacy Notice at the postal address: 1450 2nd Street Santa Monica, CA 90401 USA, or at the e-mail address: [info@facestarapp.com](mailto:info@facestarapp.com).

**1. Purpose and lawful basis of the processing**

What Data do we process, and for what purpose?

We process the following Data: photographs provided by you using the app, app usage data, your country (based on your position).

Your Data will be processed for the following purposes:

- a. to allow you to use the app features;
- b. to generate aggregate statistical data. In this specific case, your Data will be anonymized, and they cannot be traced back to you.

**2. Lawful basis of the processing**

The lawful basis of the processing for the purposes a) is the fulfillment of contractual obligations. We do not use the photographs you provide for any reason other than to provide you with the morphing feature included in the App.

The lawful basis of the processing for the purpose b) is the legitimate interest of the Data Controller. The statistical data generated will be used to operate and improve the App.

In order to use the “FaceStar” app, you shall accept the “User’s Terms and Conditions”. The User’s Terms and Conditions are available at the following link: [https://www.facestarapp.com/policy\\_facestar.pdf](https://www.facestarapp.com/policy_facestar.pdf)).

**3. Authorizations**

To allow you to use “FaceStar”, we request the following authorizations:

<b>Authorization</b>	<b>Purpose</b>
Camera	to allow you to take a selfie and use the images to create clips.
Storage	to allow you to save the clips generated on the smartphone;
Gallery	to allow you to select images from your gallery to create clips.

#### **4. Data recipients**

Your data will be transferred by Visionborne to countries outside the European Union (EU). Your Data will be transferred exclusively to countries considered “adequate” - and therefore “safe” - by the European Commission or to companies that have adhered to specific international standards (e.g., Privacy Shield Framework).

“FaceStar” uses a third-party cloud provider, Amazon Web Services (“AWS”), to edit videos. Only the images that you select are uploaded on AWS. The selected photographs are temporarily cached on the cloud servers during the editing process.

We also use Google Firebase to monitor the app usage data. The Data processing is carried out only on anonymized Data that can not be tracked back to the User.

We Use Facebook Analytics for App to monitor the app usage data. The Data processing is carried out only on anonymized Data that can not be tracked back to the User.

We use OneSignal to send you notifications related to the use of the App.

For further information about the processing of your Data by Google, One Signal and Amazon, please see the following privacy policies:

Google Firebase Privacy Policy: <https://firebase.google.com/support/privacy>

Amazon Web Services Privacy Policy: <https://aws.amazon.com/privacy/>

One Signal Privacy Policy: [https://onesignal.com/privacy\\_policy](https://onesignal.com/privacy_policy)

Facebook Privacy Policy: <https://www.facebook.com/about/privacy/>

The Data Controller is part of a joint controllership agreement (art. 26 GDPR). The essence of the arrangement is available to the data subjects and can be requested writing an e-mail to: [dpo@ulixe.com](mailto:dpo@ulixe.com).

#### **5. Data retention**

We will store and process personal data for the time necessary to fulfill the purposes specified in this privacy notice. We will not retain your Data for a longer period of time unless the current law requires a more extended retention period.

After the processed clips are sent back to you, the photos will be automatically erased from the FaceStar servers.

#### **6. Data Subject Rights**

You may exercise the rights granted by the GDPR (articles 15-22), including:

- a. The right to receive confirmation as to whether the Data Controller is processing the Data Subject’s personal data (access rights);
- b. The right to update, modify and / or correct personal data (right of rectification);

- c. The right to request the erasure of data or the restriction of the processing. This right can be granted if the process is unlawful or the controller no longer needs the personal data for the purposes of the processing (right to be forgotten and right to restriction of processing);
- d. The right to oppose to the processing (right of opposition);
- e. The right to propose a complaint to the Supervisory Authority in case of violation of the regulations regarding the protection of personal data;
- f. The right to receive an electronic copy of the Data Subject's personal data (in a structured, commonly used and machine-readable format) and right to transmit those Data to another controller without hindrance from the controller to which the personal Data have been provided (right to Data portability).

You can contact Us to exercise the rights granted by the GDPR providing the following information: name, surname. Moreover, in order to process the request, we need a copy of your identity document.

## **7. Data Protection Officer**

Our company has appointed a Data Protection Officer (DPO).

The DPO can be contacted by sending an e-mail to the following address: [dpo@ulixe.com](mailto:dpo@ulixe.com).

Privacy Notice updated on: **22/04/2020**