

Privacy Policy

Last updated July 2020

SmoothMobile, LLC and its affiliates and subsidiaries, meaning companies related by common ownership or control (collectively, “SmoothMobile, LLC”, “we”, “us”, “our”) respect your (the “user,” “you” or “your”) right to privacy and strive to maintain the confidentiality of your personal information. This Privacy Statement describes in greater detail our privacy practices for collecting and maintaining certain information collected about you. This Privacy Statement applies to all versions of the Apps known as Locker (whether operating on iOS, Mac, Android or other platform), websites, products and related services.

We may change this Privacy Statement from time to time. If we make changes, we will notify you by revising the date at the top of the page. We require you to read and agree to this Privacy Statement when you download and install one or multiple of the Locker Apps. We encourage you to review the Privacy Policy whenever you access one of the Locker Apps, or when you otherwise interact with us via e-mail, post, phone or any other means of communication.

1. Application of this Privacy Statement

This Privacy Statement (the “Privacy Policy”) applies to our Locker Apps, products, and related services whether or not they link to this Privacy Policy. SmoothMobile, LLC is the responsible entity for all Personally Identifiable Information subject to this Privacy Policy and for any services provided to users anywhere in the world.

2. Information We Collect

We generally do not collect Personally Identifiable Information from you. We may collect some limited information from you through the following channels:

- **The best way to keep information private is to never ask for it at all. Locker is designed so there is no identifiable information to protect in the first place:**
 - No user accounts or registration.
 - We never ask for your name or email.
 - Your items (photos, videos, notes, files) are only kept locally on the device (by default) or in your personal iCloud (if you enable it), and Locker’s developers are not able to view them.

- App is completely functional without an internet connection
 - On iOS 14+, photos and videos can be chosen without giving the app access to your entire photo library
- If you choose to enable the premium feature “Cloud Backup”, the backups are stored on your personal iCloud drive. We never store your files on our servers.
- We use Firebase and Kochava (for those who do not opt out) to collect statistics on how users use Locker, contact technical support, and similar. This is aggregate user data and is not affiliated with any particular user.
 - **To opt-out of ad attribution tracking for this app and all apps on your iOS device**, Go to Settings > Privacy > Advertising (at the bottom of the screen), then tap: *Opt out of targeted advertising*: Turn on Limit Ad Tracking.
- We use Firebase to collect statistics on where users are located, by country. This is aggregate user data and is not affiliated with any particular user.
- We use Kochava (for those who do not opt out) as an attribution platform to see how users who downloaded Locker through advertisements use the Apps, versus users who downloaded the Apps organically. This is for internal business purposes. This process may collect certain user device information such as device ID or IP address, but this data does not include Personally Identifiable Information such as your name, precise location or email address.
 - **To opt-out of ad attribution tracking for this app and all apps on your iOS device**, Go to Settings > Privacy > Advertising (at the bottom of the screen), then tap: *Opt out of targeted advertising*: Turn on Limit Ad Tracking.
- We use a helpdesk platform that users can register on in order to submit any help tickets. We may access to users’ e-mail address and any other information they elect to provide as part of help tickets. This information is only utilized for customer support, is stored only for record-keeping and analytics purposes, and is not shared, subject to the exclusions below.

As indicated above, we may from time to time collect automatically-collected information when you access our services (“Usage Data”), such as browser information, link interaction with our products, Internet Protocol (“IP”) address, and any other usage information collected from cookies and other tracking tools. We may also, when you enable location-based services, collect Global Positioning System (GPS) location data and/or motion data.

3. Information Disclosure

We limit any sharing of information we have collected about you to certain narrow purposes. Your information may be shared for the following reasons only:

TO COMPLY WITH LAWS OR TO PROTECT RIGHTS OF USERS

If we believe the release of information about you is necessary to respond to a legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, or safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

TO ASSIST THIRD-PARTY SERVICE PROVIDERS

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, e-mail delivery, hosting services, customer service, and marketing assistance.

TO PERFORM ANALYSIS AND MARKETING STRATEGIES WITH OTHER THIRD PARTIES

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

TO TRANSFER ASSETS IN THE EVENT OF SALE OR BANKRUPTCY

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information could be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline to honor the commitments we've made in this Privacy Policy.

4. Our Stance on Contact with You

We do not have your contact information, and the app does not use push notifications. We don't contact you, except in the case of replying to you if you contact support.

5. How We Keep Your Personal Information Safe

We use administrative, technical, and physical security measures to help protect your information. While we have taken reasonable steps to secure the information you provide to us, please be aware that despite our best efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any and all interceptions or other type of misuses. Any information disclosed is potentially vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide us your information.

6. Policy Regarding Children

We do not knowingly solicit information from children under the age of 18 unless the children have been granted permission by their parents to use our Apps. If you become aware of any data that we have collected from children under age 18, please contact us using the contact information provided below.

Contact Us

For questions or concerns relating to privacy, we can be contacted by e-mail at help@smoothmobilellc.com or by phone (201) 540-9825