



SELFIECOP

PRIVACY & DATA PROTECTION POLICY

www.selfiecop.com/privacy | Version 1.0

Version control

Action/Comment	Date
Version v1.0	May 2014

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SelfieCop Privacy Policy

Last updated: 20th May 2014

These Privacy & Data Protection policies describe how we collect, process & manage you and your child's data.

Our policies are among the **strictest of any app**, but we have made special effort to make them easy to understand.

We really want you to read and understand these policies, especially if your child is under 13 years of age.

(Children under thirteen have the right to special privacy protections, as described below.)

Introduction

SelfieCop works by sending a copy of every photo or video taken on a smartphone or tablet to a specified email address.

SelfieCop includes the following services:

- **SelfieCop:** This is our core app. This app sends a copy of every photo and video created by the device onto which SelfieCop is installed to an email address specified at setup. This app also includes an 'App Lock' feature that prevents SelfieCop or any other apps being interfered with or uninstalled without permission. App Lock also curtails access to a phone/tablet's settings.
- **SelfieCop website:** This website describes our services.
- **SelfieCop on Twitter:** This is used to communicate with our audience.
- **SelfieCop on Facebook:** This is used to communicate with our audience.
- **SelfieCop on YouTube:** This is used to communicate with our audience.
- **Other:** SelfieCop may adopt other services for incidental or permanent use.

There are two main types of user from whom SelfieCop may collect information.

- **The 'parent':** The 'parent' is the father, mother or legal guardian of a minor. The parent receives an email with a copy of every photo or video captured on the smartphone or tablet of a child.
- **The 'child':** The 'child' is the minor for whom the 'parent' is a parent or legal guardian. The SelfieCop app is installed onto the smartphone or tablet of a child as described in our Terms of Use.

The purpose of this Privacy Policy is to explain how information is collected, used and disclosed by SelfieCop whenever you interact with our applications, websites or other services (collectively called our 'services').

We welcome requests for information from our customers

[Click here](#) to find out how to access any information we have about you or how to request that we delete such information.

How we collect information from you

We collect information from you (a parent or child) in three main ways:

1. Information you provide to us directly upon installation.
2. Information you provide to us directly via customer support and other communications.
3. Information we collect automatically.

1. Information you provide to us directly upon installation

You provide information to us when you first install SelfieCop onto a smartphone or tablet.

(Note: SelfieCop is not installed onto the smartphone or tablet of a parent.)

Upon installation, we collect the following information.

The parent's email address

We record this in a database. We record your email in order to send you a copy of every photo or video taken on your child's smartphone or tablet.

Anytime you change your preferred email, we delete the old email and record the new one.

The parent's password

We record this in a database. We record your password in order to be able to send you a reminder, in case you forget it.

Anytime you change your password, we delete the old password and record the new one.

The parent's phone number (optional)

We record this in a database. This is optional.

We use the phone number in order to send you SMS notifications about how your child's activity, e.g. the number of photos or videos captured in a day.

Anytime you change your phone number, we delete the old number and record the new one.

The child's first name

We record this in a database. We use your child's first name to 'tag' the device upon which SelfieCop is installed. We then include this tag in emails whenever we send you (the parent) a copy of a photo or video.

If you have several children and each of them has SelfieCop installed, this makes it easier to quickly identify from which device a photo or video originated.

Anytime you change your child's preferred name, we delete the old name and record the new one.

You can, of course, use false names.

2. Information you provide to us via customer support, etc.

You provide information to use whenever you request customer support or communicate with us.

Typically such communication occurs via a form on our website or via email. Such communication is **private**.

Other communication may occur via Twitter or as comments on Facebook. Such communication is **not private**.

If you wish to discuss something privately, please use our online form or contact us via email.

You can of course also contact us by post or by telephone. [See all our contact details](#).

When you request customer support or communicate with us, the types information we collect are:

- Your name
- Your email address

We retain this information only for as long as needed to respond to your query. Any personal identifiable data (including from emails) is deleted within 6 months.

3. Information we collect automatically

SelfieCop collects information from users during the normal course of operations.

Some of this information is collected by our mobile app (SelfieCop) and some of it is collected by our website.

Other information may be collected by third party services, such as Twitter or Facebook.

(These services have their own privacy policies over which SelfieCop has no control. You should satisfy yourself that you accept their terms.)

Information collected from children under thirteen (13) years of age

As explained, SelfieCop sends a copy of every photo or video taken on a child's smartphone or tablet to his/her parent's email address.

SelfieCop is intended for use by the parents of children of all ages - including children under thirteen.

Inevitably, some personally identifiable information is collected from such children. That said, our *Privacy & Data Protection policies* are amongst the **strictest of any app**.

For example, we follow the relevant laws of Ireland and the European Union. These laws are extremely rigorous; much more so than those of the United States.

However, the law of the United States does make special provision for the privacy of children under thirteen, as described in the [Children's Online Privacy Protection Rules](#) (or '**COPPA**').

As such, in accordance with our obligations under '**COPPA**', specific terms about the information we collect from children under thirteen - and how it is processed - are described below.

*If you are the parent of a child under thirteen years of age, do **not** install the SelfieCop app until you have read and understood these terms.*

By installing the app, you confirm that you accept that SelfieCop may collect and process personal information about your child.

Information collected by our app (SelfieCop)

SelfieCop is installed by parents onto the phones and tablets of their children.

The nature of SelfieCop is such that some personal information from children under the age of thirteen will be collected. This includes:

- The manufacturer and model of the child's smartphone or tablet.
- The child's first name.
- Thumbnail copies of photos and videos taken by the child's device
- Usage data, including:
 - How many photos the child takes and when (time and date).
 - How many videos the child takes and when.

We acknowledge that some of this information is of great sensitivity - in particular photos and videos. It is dealt with accordingly (as described below).

You should note that no-one at SelfieCop ever sees any images.

The manner in which information is collected and handled is described here.

Step 1

Upon completing the purchase of SelfieCop, the app is installed by you (the parent) onto your child's smartphone or tablet.

As per our Terms of Use, by installing SelfieCop on the phone or tablet of a minor, you affirm that:

- You are more than 18 years of age OR an emancipated minor
- AND you possess **legal parental or guardian** consent of that minor.

Step 2

Upon set-up of SelfieCop, we collect the following core information:

- The parent's email address.
- The parent's chosen password.

- The parent's phone number. This is optional.
- The child's first name. This is optional. You may wish to use a false name.
- The model of the child's smartphone or tablet. This includes the model, operating system/version, MAC address, unique device identifier, International Mobile Equipment Identity ('IMEI') and mobile network information.

Step 3

SelfieCop comes to life every time a photo or video is captured by the camera on your child's phone or tablet.

Once a new photo is detected, SelfieCop makes a reduced file size copy of it (called a 'thumbnail') and then stores this image on your child's device.

If a new video is detected, SelfieCop takes a sample image from the recording and treats it in the same way as a thumbnail.

Step 4

Once a thumbnail has been saved, SelfieCop connects your child's device to our servers over the internet.

The image is uploaded and we then temporarily process and store the content.

You should note that the original thumbnails are automatically **deleted** from your child's device as soon as they are copied to SelfieCop's servers.

You should also be aware that the connection between your child's device and our servers is **fully encrypted**.

This means that if someone could eavesdrop on it, they would be unable to unscramble any images.

In addition, our servers are hosted in a secure facility and guarded with robust protection. Access is heavily restricted.

Step 5

As soon as a new image has been uploaded to our servers, SelfieCop matches the origin of the image (your child's device) to the right destination email address (you, the parent).

The image is then emailed to you. Again, this is **fully encrypted**.

You should note that after a child has taken a new photo or video, it usually takes only a few seconds for an email to appear in your inbox.

Step 6

As soon as an image has been emailed, all traces of it are immediately deleted from our servers. This happens a fraction of a second after the image has been sent. We never deliberately store or back-up images.

All image transactions occur automatically. This means that no-one at SelfieCop - or indeed anyone else - sees any images.

Only you (the parent) and your child see your images.

Information collected by our website (SelfieCop.com)

We log information about use of our websites, including your browser type and language, access times, pages viewed, your IP address and the website you visited before navigating to our websites.

Analytics

We may allow others to provide analytics services on our behalf, such as Google Analytics and Statcounter.

These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information.

This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand your online activity.

These services have their own privacy policies over which SelfieCop has no control. You should satisfy yourself that you accept their terms.

Cookies

We use various technologies to collect information and this may include sending cookies to you.

Cookies are small data files stored on your hard drive or in device memory that help us to improve our Services and your experience, see which areas and features of our Services are popular and count visits.

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies.

Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our website.

Where information is stored & processed

SelfieCop operates from and is based in **Ireland**.

However, information collected by SelfieCop is stored and processed by our internet service provider (ISP) [Liquid Web](#) in the **United States of America**.

By accessing or using our Services or otherwise providing information to us, you consent to the processing and transfer of your information to the US.

EU citizens should note that Liquid Web has confirmed to us that it adheres to the [Safe Harbor agreement between the US and EU](#).

This means that the data of EU citizens gathered by SelfieCop and transferred to the US is subject to the stricter data protection rules of the European Union's *Directive 95/46/EC on the protection of personal data*.

Read more about [Safe Harbor](#), and read [Liquid Web's privacy policy as regards Safe Harbor](#).

How we use the information we collect

As explained above, SelfieCop emails a copy of every photo and video taken on a child's smartphone or tablet to you, the parent.

To that end, we rely on accessing the following core information from you and your child:

- **From your child:** Every photo and video captured by their smartphone or tablet.
- **From you, the parent:** Your email address.

You should note that we never send images to anyone other than to the email address specified by you, the parent (except where required by law).

Further emails to you and your right to opt-out

From time to time we may use your (the parent's) email for contact purposes. This includes:

- To send you technical notices, updates, security alerts and support and administrative messages.
- For information about child protection issues.
- To provide, maintain and improve our Services.
- To respond to your comments, questions and requests and provide customer service.
- To communicate with you about products, services, offers, promotions, rewards and events offered by SelfieCop and others and provide news and information we think will be of interest to you.

Such communication will be infrequent. If you wish you may **opt out** of such updates (with the exception of updates of major concern). To so do, [simply contact us](#).

Notifications to the App

We may also occasionally send 'push' notifications or alerts to your child's device, e.g. to notify them that an update is available. However, we affirm that we will **never** use such notifications for marketing at children.

If you wish, you can deactivate these messages at any time by changing the notification settings on your device (iOS) or by changing your settings within our Services (Android).

Other ways we use data

Finally, we may also use information from other sources (log files, analytics) to:

- Monitor and analyse trends, usage and activities in connection with our Services.
- Link or combine with information we get from others to help understand your needs and provide you with better service;
- Detect, investigate and/or prevent fraudulent, unauthorized or illegal activity; and
- Carry out any other purpose for which the information was collected.

How we share information we collect

We may share information about you as follows or as otherwise described in this Privacy Policy:

- In response to legal process or a request for information if we believe disclosure is in accordance with any applicable law, rule or regulation or as otherwise required by any applicable law, rule or regulation.
- In order to investigate or remedy potential violations of our user agreements or policies or to protect the rights, property and safety of SelfieCop, our users or others.
- In connection with or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.
- We may also share aggregated or de-identified information, which cannot reasonably be used to identify you or your child, e. g. to assist child protection agencies understand smartphone use among children.

The security of the information we collect

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

A more complete description of security is provided in our [Terms of Use](#).

How to request your information

We welcome requests for information.

If you wish to access any information we have about you, [please contact us](#). Such requests typically take about **5 days** to process.

Important

Requests for information will only be accepted when received from an email address that is registered as an installation of SelfieCop. This is to safeguard your privacy.

Please note, the information we can send you is quite limited as a result of the many privacy restrictions we place on our own operations. Common information may include:

- Your email address
- Your password
- Copies of emails sent or received for customer service purposes.
- The manufacturer and model of your child's smartphone or tablet.
- Your child's first name.
- Your child's usage data, including:
 - How many photos your child takes and when (time and date).
 - How many videos your child takes, of what duration and when.

Important

Copies of emails and images sent by the SelfieCop app are not available.

All emails and images are continually and automatically purged from our service, notwithstanding that:

- Residual instances of some images may remain on our servers for short periods.

- We may retain certain information as required by law, for legitimate business purposes or as part of our regular retention practices.
- We may also retain cached or archived copies of information about you for a limited period, e.g. customer support emails.

How to ask us to delete your information

If you wish, you can ask us to **delete all information** about you (parent) and your child.

This includes:

- Your email address
- Your password
- Any copies of emails sent or received for customer service purposes.
- The manufacturer and model of your child's smartphone or tablet.
- Your child's first name.

To do so please [contact us](#). Such requests typically take about 5 days to process.

We may change this Privacy Policy

We may change or modify this Privacy Policy at any time and at our sole discretion.

If we make changes to this Privacy Policy, we will inform you of such changes.

This may include by:

- Sending you a notification
- Posting a notice on our website
- Posting a notice on Twitter or Facebook
- By updating this page

We will endeavour to make such notices as clear as possible.

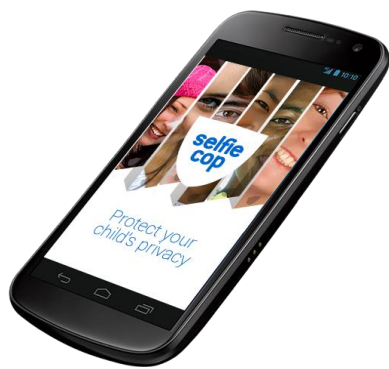
We encourage you to keep in contact with us to ensure you understand this Privacy Policy.

If you do not agree to this Privacy Policy, stop using our Services and delete SelfieCop.

Contact us

SelfieCop welcomes comments, questions, concerns or suggestions.

To contact us, please visit <http://www.selfiecop.com/contact/index.htm>



SelfieCop. Protect your child.

Get a copy of every photo taken on your child's smartphone.

Learn more at www.selfiecop.com