# Privacy Policy of SmartPen

#### **Owner**

Lugo Okeke

### Types of Data collected

None, Every image processing is done on-device using CoreML.

### Mode and place of processing the Data

## Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthor

### Additional information about Data collection and processing

We do not store or sell any face or media data.

# System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) and use other Data for this purpose.

# Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

#### Information for Californian consumers

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case

may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users who are consumers residing in the state of California, United States of America, according to "The California Consumer Privacy Act of 2018" (Users are referred to below, simply as "you", "your", "yours"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal information" as it is defined in The California Consumer Privacy Act (CCPA).

## Questions, concerns, or complaints

if you have any comments or questions regarding our Privacy Policy, you can contact us at lugookeke@icloud.com