

## Skyda eSIM Privacy Policy

Valid from 24 March 2024

*Last updated at 24 March 2024*

Skyda is committed to safeguarding your privacy and ensuring you have a positive experience on our services. This policy outlines our practices regarding data collection, usage, and sharing when you use our eSIM services. We respect your privacy rights and aim to comply with applicable laws and regulations to protect your personal information.

### [1] Who We Are

Dragon Secure GmbH built the Skyda eSIM app which utilizes a cutting-edge eSIM technology allowing seamless mobile connectivity across the globe without physical SIM cards. Our services facilitate effortless internet access and communication, ensuring secure and encrypted connections for users worldwide.

### [2] Data Controller

**Dragon Secure GmbH** (company code CH-170.4.019.396-6, registered at Bahnhofstrasse 20, 6300, Zug, Switzerland) which determines the purposes and means of the processing of personal data.

If you have any questions about data protection at Dragon Secure GmbH, you can contact us directly. Send us an e-mail to [info@skyda.co](mailto:info@skyda.co).

### [3] What Information Do We Collect

We collect personal information that you voluntarily provide to us when you register on our Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when contact us.

**Personal Information Provided by You.** Skyda eSIM is a communication service. You provide your e-mail address to create a Skyda account.

**Sensitive Information.** We do not process sensitive information.

**Payment Data.** Skyda eSIM does not process payments from users. Skyda eSIM is using Stripe integration for both Google Play billing and Apple App Store billing. All payment data is handled by these parties. It is important to note that even if the payment data is stored in Stripe, Skyda may have access to certain transaction details, such as purchase history or status, for the purpose of managing the user's in-app purchases or subscriptions.

**Cookies.** To enhance your experience on our Services and provide personalized content, we utilize both session cookies and persistent cookies. These cookies enable us to recognize your login status and track your interactions with the Services. Additionally, we employ cookies to monitor overall usage patterns, analyze web traffic, and optimize and customize the Services. Unlike persistent cookies, session cookies are removed when you log off from the Services and close your browser.

Most browsers accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

**Analytics.** We may utilize Google Analytics to gather data on visitor behavior and demographics for certain Services, as well as to enhance website content. This analytical information is not linked to any personally identifiable information. To learn more about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). If you wish to opt out of Google's data collection and processing associated with your use of the Services, you can visit [www.tools.google.com/dlpage/gaoptout](http://www.tools.google.com/dlpage/gaoptout).

Our uses of Website technologies fall into the following general categories:

**Operationally Necessary.** We may use technologies that are necessary to the operation of the Services, and related applications, and tools.

*Performance Related.* We may use technologies to assess the performance of the Services, including as part of our analytic practices to help us understand how our visitors use the Website, determine if you have interacted with our eSIM service, determine whether you have viewed an item or link, or to improve Website content, the App or other Services and related tools.

*Advertising or Targeting Related.* We may use first-party or third-party technologies to deliver content, including ads relevant to your interests, on the Website or on third party sites.

*Cookies and Interest-Based Advertising.* As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences.

We adhere to industry standards and regulations governing targeted advertising, including the *Digital Advertising Alliance's Self-Regulatory Principles*, to ensure that our advertising practices are transparent, privacy-conscious, and aligned with best practices in the industry.

**Application Data.** If you use our application, we also may collect the following information if you choose to provide us with access or permission:

- *Mobile Device Data.* We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application you accessed.
- *Push Notifications.* We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application, for troubleshooting, and for our internal analytics and reporting purposes.

#### **[4] Your Rights**

According to relevant data protection laws, you have certain rights regarding your personal data. These rights include: **(1)** the ability to request a copy of all your personal data that we store and to transfer that copy to another data controller; **(2)** the right to delete (as explained in section 7 below) or modify your personal data; **(3)** the option to restrict or object to the processing of your personal data; **(4)** the right to rectify any inaccurate or incomplete personal data we hold about you; and **(5)** the freedom to file a complaint with national data protection authorities concerning how we handle your personal data.

#### **[5] Storing Data**

We aim to protect your personal information. Your data is hosted on Amazon Web Services (AWS). We take advantage of all the security and privacy features AWS provides. For more specific details regarding how AWS keeps data secure, please refer to <https://aws.amazon.com/security/>.

#### **[6] Retention**

Unless stated otherwise in this Privacy Policy, the personal data that you provide us will only be stored for as long as it is necessary for us to fulfill our obligations in respect of the provision of the Services.

#### **[7] Skyda Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from out active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

## [8] Applicable Law

We will handle Personal Data in accordance with this Privacy Policy and all applicable data protection and privacy laws and regulations, including the European Union General Data Protection Regulation (2016/679) (the "GDPR").

## [9] Legal bases we rely on to process your information

We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil out contractual obligations, to protect your rights, or to fulfil out legitimate business interests.

***If you are located in the EU or UK, this section applies to you.***

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  - Develop and display personalized and relevant advertising content for our users
  - Analyze how our Services are used so we can improve them to engage and retain users
  - Support our marketing activities
  - Understand how our users use our products and services so we can improve user experience.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

## [10] Third-Party Service Providers

We may share your data with third-party service providers who perform services for us or on our behalf and require access to such information to do that work. The third parties we may share personal information with are the following: *Google Analytics, Google Play Store, Apple App Store, AWS, Firebase, Pusher, Cloudflare.*

## [11] Updates

We will update this Privacy Policy as needed so that it is current, accurate, and as clear as possible. Your continued use of our Services confirms your acceptance of our updated Privacy Policy.

## [12] Terms

Please also read our Terms of Service which also governs the terms of this Privacy Policy.