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You may use the "Contact Us" details at the end of this Policy to exercise your rights and choices. For those users in the European Union (EU) or the European Economic Area (EEA), we generally consider ourselves to be the "controller" of the "personal data" we collect and process, and we do so in compliance with the EU General Data Protection Regulation, 2016/679 (GDPR). We try to respond to all legitimate requests regarding your personal information within one month. Occasionally, it could take us longer than a month if your request is particularly complex or if you have made a number of requests. In such cases, we will notify you and keep you updated. The timeframes described here do not apply to our response times for addressing ordinary customer service and support requests unrelated to the exercise of personal information access rights. Although imo uses commercially reasonable efforts to provide individuals with access to their personal information and to respond to their requests, there may be circumstances in which imo needs to ask you for more information in order to identify your account, and we may ask you to demonstrate your identity. If you cannot demonstrate your identity, imo may be unable to provide access. This may occur (a) when the information contains legal privilege; (b) when complying with the request would compromise others' privacy or other legitimate rights; (c) when the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question; or (d) where the information is commercially proprietary. If imo determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, imo will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal information. Request of access. You have the right to request a copy of the personal data that we hold about you, as well as to inquire about the origin, recipients, and purposes of that data. There are certain exceptions to this right, however, so we may deny access to you as required by law or to protect the legal rights of others. You can request a download of your account information in the Service. To request a download, navigate to the "Request Account Info" button inside the Settings section of the Service. Request correction. You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Our goal is to keep your personal information accurate, current, and complete. Please contact us if you believe that your information is not accurate or if your information changes. You may edit your account information via the Service. Right to Erasure and Deletion of Your Personal Information. You may have a legal right (for instance, if you are located in the EU or EEA under the GDPR) to request that we delete your personal information when it is no longer necessary for the purposes for which it was collected, or when, among other things, your personal information has been unlawfully processed. You may delete your chat history stored on imo's servers, for any reason, by selecting the "Delete chat history" option in the settings of the Service. You may delete your entire imo account, by selecting the "Delete imo account" option in the settings. We also may decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives. When we delete personal information, it will be removed from our active servers and databases and our Service, but it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, to resolve disputes, or to enforce any agreements, such as limited information about your mobile device that may be retained for the purposes of fraud detection and enforcement of our Terms of Service. Right to Object. In certain circumstances, as permitted under applicable law, you have the right to object to processing of your personal information and to ask us to erase or restrict our use of your personal information. If you would like us to stop using your personal information, please contact us and we will let you know if we are able to agree to your request. Right to Portability. You have the right to request that some of your personal data be provided to you or an authorized third party in a commonly-used, machine-readable format. You can request a download of your account information in the Service. To request a download, navigate to the "Request Account Info" button inside the Settings section of the Service. If you require the direct transfer of data to another responsible party, this will only be done to the extent technically feasible. Right to Withdraw Consent. If you have provided your consent to the collection, processing, and transfer of your personal information, you have the right to fully or partially withdraw your consent. We attempt to comply with all reasonable and legitimate requests. As discussed above, you may modify the permissions and settings on your mobile device and the Service in order to limit access to certain information. To withdraw your consent with respect to emails and other communications from us, please notify us or follow the opt-out links available in the communications sent to you. Once we have received notice that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented, unless there are compelling legitimate grounds for further processing that override your interests, rights, and freedoms or for the establishment, exercise or defense of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal information for the provision of our Service. However, changing the permissions and settings on your mobile device or within the Service may cause certain features of the Service to stop functioning. Updating Your Personal Information. If any of the personal information you have provided to us changes, please let us know. For instance, if your email changes, you wish to cancel any request you have made of us, or if you become aware of inaccurate personal information about you, please contact us to update your information. You may edit your account information via the Service. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us. 8. Data Retention We will retain your personal data for as long as needed to fulfill the purposes for which it was collected and to provide the Service to you. As a result, data retention periods may depend upon the feature of the Service for which the data was provided. For example, we will collect, save and store all information contained in your imo chat history for up to 90 calendar days, including your chat history, photos, videos, stickers, and missed calls. Stories are available in the Service for 24 hours. If you are a premium user, you can elect to save this information on our servers for a longer period of time. You can delete your imo chat history at any time. We store your imo chat history in the ways previously described to allow you to access your chat history, photos, videos, and missed calls for your own purposes. However, we cannot guarantee that other users won't record live feeds or other information you share with them, and another user may have a copy of information even if deleted by you and us. We also will retain and use your personal data as long as necessary to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements. For example, we may collect aggregated data from your chat history that is used to build language models which help us improve the Service. This data helps us to better understand our users' interests, analyze trends, and customize the user experience. When we no longer have a purpose for retaining your personal data, we will use commercially reasonable efforts to securely destroy your personal data in accordance with applicable law and our policies. 9. Data Security We maintain appropriate technical and organizational measures to prevent your personal information under our control from being accidentally lost, used or accessed in an unauthorized manner, altered or disclosed during collection, storage, and processing. All information you provide to us is stored on our secure, limited-access servers behind firewalls. Access to your account, personal data, and information is restricted within our organization to those employees and trusted partners that need access to your personal information in order to correspond with you and provide the products and/or services that you requested from us. Your personal data and information is also password-protected so that only you can log in to your account. Any additional safeguards used to protect personal information will depend on the sensitivity of the personal information; the amount, distribution and format of the information; and the method of storage. While our security measures seek to protect your personal information in our possession, no security system is perfect and we cannot guarantee that your personal information will remain absolutely secure in all circumstances or that any privacy settings or security measures used in connection with the Service cannot be circumvented. Therefore, we cannot guarantee that unauthorized third parties will not be able to circumvent those measures or other safeguards in use, or access and/or use your personal information for improper purposes. Most communications on our Service, including any submissions through available forms, are sent through the standard HTTP protocol and completed forms may be delivered using regular e-mail. Information sent over HTTP and email is not encrypted; and, while these are convenient communication mechanisms, use of these insecure communication methods presents privacy and security risks (e.g., e-mail is not a secure form of communication, is unreliable, can be forwarded, etc.). Any transmission of information that you make to us or through our Service is at your own risk. The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of the Service, you are responsible for keeping the password confidential. Do not share your password with anyone else. Restricted areas of the Service include social networking, chat room, or forum features. Please ensure that, when using these features, you do not submit any personal data that you do not want to be seen, collected or used by other users. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice within the Service. If a security breach causes an unauthorized intrusion into our Service or systems that compromises your data, we will notify you and any applicable regulator when we are required to do so by applicable law. 10. International Transfer Our company headquarters are located in California, United States. We store and process your personal data and information on servers in the United States, Asia, and other countries outside of the EU, EEA or your home country. Be aware that your personal data and information is transferred to, stored in, and processed in these third countries which may not have the same adequate level of data protection as in your home country. However, all transfers of personal data will be performed in accordance with the requirements of applicable law. For example, we apply appropriate safeguards such as EU Standard Contractual Clauses for EU/EEA users' personal information. If you do not agree to the transfer of personal data outside of the EU/EEA or your home country, you must not use the Service. While the data protection, privacy, and other laws of the United States and other jurisdictions might not be as comprehensive as those in your country, we take steps to protect the security and privacy of your personal information as set forth above. 11. Children's Privacy The Service is not directed to children under 13 years of age, and if you are in the EU/EEA regions, 16 years of age (or the relevant age in your country where you are considered a minor), and imo does not knowingly collect personal data from children. If you learn that your child has provided us with personal information without your consent, you may delete your child's entire account, by selecting the "Delete imo account" option in your child's imo app settings or alert us at [privacy@imo.im](mailto:privacy@imo.im). If we learn that we have collected any personal information from a child, we will promptly take steps to delete such information and terminate the child's account. This section supersedes any age limitations that may be listed in connection with the ratings listed in an application store. 12. Redress and Accountability If you have any questions about our privacy practices or this Privacy Policy, please contact us by email at [privacy@imo.im](mailto:privacy@imo.im) or via the methods listed below. We will address your concerns and attempt to resolve any privacy issues in a timely manner. 13. Changes to our Privacy Policy We reserve the right, in our sole discretion, to update, change, modify, add or remove portions of this Policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new Policy on this page and provide notice that an update has occurred by either (a) sending notice to you at the email address specified in your account, or (b) using an in-app alert on the first time that you use the mobile application after we make the change. You will be asked to check the "I Agree" box to confirm that you have read, understand, and agree to the updated terms. You are responsible for providing us with an active, up-to-date, and deliverable email address for contacting you. It also is your responsibility to carefully review this Policy prior to using the Service and from time to time so you are aware of any changes. The date this Policy was last revised is identified at the top of this Policy. 14. Contact Us If you have questions or comments about this Policy, wish to access personal information we hold about you, believe the personal information we have about you is incorrect, or wish to lodge a complaint with us about how we have handled your personal information, please use the contact details below and we will do our best to assist you: Address: 395 Page Mill Road, Suite 100 Palo Alto, California 94306 Email: [privacy@imo.im](mailto:privacy@imo.im)

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