

## Privacy Policy

Mobile Application Shifter provide high respect to customer data security. Our Privacy policy describes our customer data processing process taken by us for the services provided by our software and applications (the Service).

### 1. Consent

By visiting, installing or using the Service, you understand and consent to be legally bound by this Policy, otherwise, you may not use the Service.

We may amend this Policy from time to time without notice, continued visiting, installing or using the Service after each amendment in effect means that you understand and consent to the revised Policy.

The Service is direct to users aged 18 and above, if you are under 18, you may not use the Service and your consent will be invalid.

### 2. Minimal Data

The Service is designed based on the principle of minimal data and all the processing is done under the legal basis of the agreements including this Policy and the Terms of Service between you and us, authorized by your clear consent. The Service does NOT log what you do while connected to the Service, does NOT log any content of any communications unless the communication is with us, does NOT log your original IP address.

### 3. Information We Collect and Store

Personal information: The Service is not collecting your personal information (please note that additional information may be collected if you contact us).

Non-personal information: (i) Data related to your device information and, app version, connection time stamp, the server and the protocol you connected, total data used, network type and the error report (if any) will be automatically collected when you visit or use the Service.

Data related to your purchase: as original transaction ID and purchase time stamp (start date and expiring date).

### 4. How We Use Your Information

We will not sell, use or disclose any data to third parties for any purpose without your permission. We will not do targeted advertising, user profiling, or snoop your privacy. We will only use your information in certain ways and for certain purposes, as stated in this Policy.

Your additional information collected if you contact us is mainly used to analyze our product distribution and for product planning. Non-personal information is mainly used for the Service's optimization, for example, when something wrong and you ask us for user support, we need specific data to figure it out and then shoot the trouble. We may also use the information above to track the features of the Service to better analyze, understand, and enhance the Service, and to further improve the experience and satisfaction of our users.

## 5. How We Store Your Information

The data of our users is stored in servers located in the EU and may be accessed by us from time to time outside the EU, for the purpose of providing and boosting the Service to you.

## 6. Disclosure

If we have a good-faith belief that it is reasonably necessary to comply with a law, regulation, legal process or governmental request, we may preserve or disclose your data according to such law enforcement requests.

This may include legal requests from the jurisdictions which we are operating under.

## 7. Your Rights

You have the rights to access, correct, transfer, be forgotten or object to the processing of your personal data, you can also lodge a complaint to the competent supervisory authority. If you want to exercise such rights or have any questions about this Policy, just contact us.

Please note that we may need a month to respond and ask you to verify your identity before responding.

Our email is: [info@shifternvpn.com](mailto:info@shifternvpn.com)