

PRIVACY POLICY

Last updated: February 06, 2025

Hi there! If you are here, you probably wanted to learn more about APKM privacy policy concerning the SDK that you agreed to activate as part of the application you are using. FYI, full information regarding APKM is on <https://apkm.org>. A link to this page appears on:

- The consent screen asks you if you want to opt-in to APKM's network
- The application developer's terms of use and privacy policy
- On our own website

This page has two parts:

1. An overview of the privacy policy, written in simple English
2. The official, legal privacy policy

The overview is provided for information purposes only, for your convenience. The overview is a summary of the main points in the policy but is not an exhaustive legal document. We encourage you to read the entire policy to better understand how you can update, manage, export and delete your information. In case of any conflicts between these two parts, the official legal privacy policy takes precedence.

APKM's SDK privacy overview

Let's be very clear: We don't know any personal information about you, who you are, or what you do online.

- We don't know your name, your email, what web pages you visit, or what apps you use.
- We don't read identifiers that already exist on your device (for example: Apple's IDFA)
- We don't leave any cookies or other identifiers on your device.
- We don't know or track what you do on a specific app, or across several apps.
- Since we don't have any data about you, we of course have nothing to share with 3rd parties.

In other words, to us all APKM's SDK users are anonymous and indistinguishable. We just don't need to know any of your personal information, and we don't track you in any way.

There is one thing we know, and that is your IP address. We respect all applicable data privacy regulations when it comes to it. BTW, you know who else knows your IP address? Any website you visit, and any app you use – they all know your IP address too. Don't believe it? Try googling "what is my IP address" for example, or check your Internet speed on www.speedtest.net or check your location on iplocation.net. Can you see your IP address come up on screen?

Even though we know your IP, we do not use it for APKM's ongoing business operations. In fact, the reason we collect it is to comply with GDPR (e.g. record the fact you gave your consent) and to comply with other legal requirements.

To summarize – search engines, social networks and advertising networks all need some sort of information about you in order to decide which ads to display to you. APKM's SDK is totally different. It does not display ads, does not collect any of your personal information, and does not track you in any way.

We hope this helps clarify what we know about you. Now, feel free to read the full policy:

Our official privacy policy

APKM ("APKM", "We," or "Us") is the owner of the APKM SDK the APKM software ("the Software"), the APKM SDK ("the SDK") and the APKM services, any accompanying services, features, content, and applications offered by us (collectively referred to herein as "the Services"). We are concerned about your privacy and have designed this Privacy Policy to help you decide whether to use the Services. This Privacy Policy is a legally binding agreement between you ("You" or "User") and us. By accessing and using the Services, or providing information to us in other formats, you agree and accept the terms of this Privacy Policy as amended from time to time and consent to the collection and use of information in the manner set out in this Privacy Policy. We encourage you to review this Privacy Policy carefully and to periodically refer to it so that you understand it and any subsequent changes made to it.

IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, PLEASE STOP USING THE SERVICES IMMEDIATELY AND UNINSTALL WHERE RELEVANT.

IN ADDITION TO THIS POLICY, PLEASE REVIEW OUR END USER LICENSE AGREEMENT, WHICH IS INCORPORATED HEREIN BY REFERENCE, TOGETHER WITH SUCH OTHER POLICIES OF WHICH YOU MAY BE NOTIFIED BY US FROM TIME TO TIME.

The Services

APKM provides proxy services and data collector products and services. APKM gives its customers the ability to route traffic through its peers' available resources. APKM treats certain devices of peers as nodes in the APKM network used to operate the Services. Peers agree to share their available resources and become part of the APKM network in return for free features, ads, free apps, etc.

What types of information do we collect?

We collect the following types of data from you when you use the Services:

- **Non-Personal Information:** This information cannot be used to identify the user from which that data was collected. Such Non-Personal Information include aggregated usage information and technical information transmitted by your device, such as your approximate geo-location, hardware specifications, OS and SDK

version, browser type and version, the date of the Software installation, your URL requests, and respective time stamps.

- **Personal Information:** Personal Information is information that identifies or may identify you. The only Personal Information we may collect and retain is your IP address, which is necessary to provide our Service. Any Non-Personal Information that is specifically connected or linked to any Personal Information, is treated by us as Personal Information as long as such connection or linkage exists.

Legal basis for processing

Processing of Personal Information is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and to comply with our legal obligations.

How we use the information we collect

We may use the information for the following:

- To provide our Services, including audits and calculations of fees;
- To detect and prevent illegal activity, activity that violates our terms of use, or any other type of activity that may jeopardize or negatively affect the integrity of the Service;
- To perform analysis and research to improve the Service;

Information we share

We do not rent, sell, or share your Personal Information with third parties except as described in this Privacy Policy.

We may transfer or disclose Personal Information to our subsidiaries, affiliated companies, subcontractors, or such other trusted third-party service providers or partners, who are located in different jurisdictions across the world, for: (a) storing or processing such information on our behalf (e.g. on cloud computing services) or to assist us with our business operations, to authenticate your access and to provide and improve our Service; (b) performing research, technical diagnostics, analytics or statistical purposes.

The above shall be deemed as the categories of Personal Information we have disclosed for a business purpose in the preceding 12 months for the California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100 et seq. (“CCPA”).

We may also share your Personal Information and other information in special cases if we have good reason to believe that it is necessary to: (1) comply with law, regulation, subpoena or court order; (2) detect, prevent or otherwise address fraud, security, violation of our policies or technical issues; (3) enforce the provisions of this Privacy Policy or any other agreements between you and us, including investigation of potential violations thereof; (4) protect against harm to the rights, property or safety of us, its partners, its affiliates, users, or the public. We have not sold (as this term is defined under the CCPA) Your Personal Information in the preceding 12 months.

Security and Confidentiality

We use industry-standard security tools and measures, as well as internal procedures and strict guidelines to prevent information misuse and data leakage. Our employees and contractors access the information on a need-to-know basis and are subject to confidentiality obligations.

We use measures and procedures that substantially reduce the risks of data misuse, but we cannot guarantee that our systems will be absolutely safe. If you become aware of any potential data breach or security vulnerability, you are requested to contact us immediately. We will use all measures to investigate the incident, including preventive measures, as required.

Since we operate globally, it may be required to transfer your Personal Information to other countries worldwide. In these instances, we will take steps to ensure that a similar level of protection is given to your Personal Information through adequate legal mechanisms, in accordance with the GDPR.

Your Choices and Retention

We value your privacy and your control of personal information. You may therefore notify us that you wish to review your Personal Information or delete it. You can notify us by sending an email to support@apkm.org. You may choose at any time not to allow us or any third party to collect data about you. You may request to view or edit Personal Information that is stored about you.

For EU residents: Please note that the following rights specifically apply regarding your Personal Information:

1. Receive confirmation as to whether or not Personal Information concerning you is being processed, and access your stored Personal Information, together with supplementary information;
2. Receive a copy of Personal Information you directly volunteer to us in a structured, commonly used and machine-readable format;
3. Request rectification of your Personal Information that is in our control;
4. Request erasure of your Personal Information;
5. Object to the processing of Personal Information by us;
6. Request to restrict processing of your Personal Information by us;
7. Lodge a complaint with a supervisory authority.

Please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements.

As of January 1st 2020, California residents are granted the right not to be discriminated against for having exercised their rights under the CCPA. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services;
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services;

If you are a resident of California, United States, you have the right to send us a written request regarding a list of Personal Information categories that we may have disclosed to third parties or to which we may have given to third parties, and the details of such third parties. To exercise such right, you may contact us at:

support@apkm.org

We will retain your Personal Information for the duration required to provide our App, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing Personal Information, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

Change of Ownership

In the event of a change of ownership or control of all or a part of APKM, including without limitation through acquisition, merger, or sale, we reserve the right to transfer all or part of the Personal Information we store in our systems.

Changes to this Privacy Policy

This Policy may be revised from time to time at our sole discretion, so please check it regularly. The last revision will be reflected in the “Last Updated” heading. Any change of this policy will be posted on the Site. Your continued use of the Services following any such changes will be considered as you consent to the amended Privacy Policy.

Contact Us

If you feel that your privacy was not treated in accordance with our Privacy Policy, or if you believe that your privacy has been compromised by any person in the course of using the Services, please contact APKM at: support@apkm.org