



Camarilla Privacy Policy

*Valid as of the 1st of November 2015

1. Introduction

Camarilla is a discreet photo messaging application to capture and share your true moments with a selection of up to 15 people that matter to you most. While shared photos are visible to your private selection of Contacts, all Chats are strictly one-on-one.

Camarilla was founded because of the need of consumers worldwide for more privacy. We acknowledge that You want to know into great detail how Your privacy is respected and secured. That is why We inform You in this Privacy Policy about the way Camarilla protects Your privacy, so that You can make a well-informed decision whether or not to use Our Services. Just like with Our Terms and Conditions, You should not use (or continue to use) Our Services if You do not agree with this Privacy Policy. The Privacy Policy consists of the following elements:

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These Privacy Policy forms, together with the Terms and Conditions, the complete agreement between You and Camarilla. Should any provision of these Terms be deemed invalid by a court of a competent jurisdiction, the invalidity of these specific provisions shall have no effect on the validity of the remaining provisions. These remaining provisions of these Terms shall remain in full force and effect. Whilst there will be translations of these Terms in local languages, this English version shall prevail.

Although this document is a proper legal document and is written as a legal contract, the most important thing is to use your common sense when using the Camarilla Services.

Camarilla reserves the right to modify this Privacy Policy. You shall be notified of any changes at least one month before they come into effect. Should You disagree with the new version of the Privacy Policy, you shall stop using the Services. Your continued use of the Services shall imply that You accept the amended Privacy Policy.

2. Definitions

Words that are capitalized shall have the following meaning:

Term	Meaning
Camarilla	Camarilla B.V., also referred to as the Company, We or Us is the operator of the Services
Camarilla-Content	Content of other (intellectual) properties that belong to Camarilla or are licensed to Camarilla
Chat(s)	Messages on Camarilla between You and Your Camarilla Contacts
Cookies	Small text file that contains alphanumeric characters. It is basically a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time
Contact	Another physical person with whom you have connected using the Services with whom you can share Content, with a maximum of 15 (fifteen) persons
Content	Posted content using the Services, whether photo's, video's images, sound recordings, text, location data or chats
Privacy Policy	The Camarilla policy that describes the information we collect, how we use that information and how we share that information
Services	All Services that are rendered by Camarilla to you, consisting of the Camarilla application, the underlying software and the Camarilla Website
Terms	These terms and conditions
You	The user of the Services. Also used as Your or Yours

3. What is covered by the Camarilla Privacy Policy?

This Privacy Policy is incorporated into and is subject to the Terms of which it is part. It covers the treatment of (personal) information while using Our Services. It does not apply to the practices of third parties, including third parties that are mentioned in clause 5.2, or to individuals that are not managed or employed by Camarilla.

4. What information is collected by Camarilla?

4.1. What information is collected?

When registering for and using the Services of Camarilla, the following types of information regarding You as a natural person and Your mobile phone may be collected:

1. Personal information provided by You: when signing up for the Services and while using the Services, You provide Us with certain personal information, such as
 - a. Your mobile phone number;
 - b. Your country access code;
 - c. Your username;
 - d. Your profile picture and
 - e. Your email address;

2. Cookies: when You visit the Camarilla website, We shall send one or more Cookies to your computer to identify Your browser;
3. Log-file information:
 - a. While visiting the Camarilla website, Our webserver will record certain information that Your browser automatically sends when visiting any website. These logs will hence contain IP addresses, browser type and version, entry- and exit pages, time spent on the website, etc.
 - b. When You use the application, our servers log information that is sent by the Camarilla application while You are using it: when you log on, Your IP address, iOS version and model of Your device, whenever Content is uploaded, viewed by Your Contacts, when a Chat is sent and received, including date and time information and the Contacts the Chats were sent from and to;
4. Content and Chats. Camarilla can and/or will store:
 - a. Your uploaded photos and/or videos and the comment that You add to it including the date and time of the post
 - b. Your Chat messages in reaction to photos of Your Contacts including the date and time of the Chat message
 - c. Your Contacts
 - d. Your location data

4.2. How long does Camarilla retain data?

Camarilla retains data indefinitely in order for You to be able to access Content. You can request Us in writing to delete all your personal data from Our servers. Camarilla reserves the right to delete data on Our servers after 5 years. You can request Camarilla in writing to delete Your personal data. Upon such request, Camarilla shall delete Your personal data within a commercially acceptable timeframe.

4.3. What information is not collected?

Camarilla does not collect and store names, e-mails, e-mail addresses, physical addresses or other information from Your contact-list on Your mobile phone. If You select people from Your contact-list to add as a Camarilla Contact, this shall occur on the fly on the mobile phone itself and this information shall not be transmitted to Our servers. These persons will receive an SMS message and will have the option to download the Camarilla application and accept Your invitation and if they are already User of Camarilla, they can directly accept or decline Your invitation.

Camarilla does not collect location data, but users can always decide to share location data as Content or as Chat.

5. Use of information

5.1. How does Camarilla use information?

Content

Our use of Your personal information essentially enables us to optimally operate Our Services to You. So if You submit personal information (such as Your mobile phone number) and Content to Camarilla, then we use that information to operate the Services, i.e. to provide to You the features and functionalities of the Services. Any personal information that You disclose as Content shall be available to Your Contacts in a one to one manner. Your username shall be displayed in Chats or when you post Content. It will not be possible for your contacts to store your Content (automatically) on their phone/device, by other means than making a screendump/screenphoto.

Personal information

Camarilla will only use Your mobile phone number for operational, informational and administrative purposes, so You shall not receive commercial messages from Us by SMS. We may use Your personal information and user statistics (such as IP addresses, iOS versions, phone types, cookies, etc) to improve the quality and design of the Camarilla Services and to collect data for potential new services or features. We may use cookies and log files to:

- Remember You to prevent You having to log on every time You want to use the Services;
- Provide customized information to You;
- Collect collective and personal statistics such as time spent, number of Contacts, etc;
- Track the quantity of Content and Chats.

Camarilla does not sell to or share, without your consent, with any third party Your personal information (such as Your mobile phone number, Your name, etc).

Camarilla may share non-personally-identifiable information, such as anonymous user usage data and Content related statistics, with third parties such as potential advertisers or market researchers to help them comprehend the usage and distribution of Content.

Cookies

Camarilla only uses cookies for analytical purposes, not for any commercial or tracking purpose.

Log file

Log file information will only be used for analytical purposes and for the response to queries as mentioned in clause 5.2.

5.2. When does Camarilla disclose information?

You have the legal right to see and potentially correct Your personal data. All personal data that Camarilla stores can be viewed and corrected while using the application. Other users that are not Your Contacts cannot see any of Your personal information or Content. Your Content is only visible to Your Contacts and no-one else.

Camarilla may collect and disclose (non-) personally identifiable information if the law requires Us to do so or if We believe that such disclosure would mean compliance to Dutch or international laws or to respond to a court order or subpoena.

Finally, Camarilla reserves the right to disclose personally identifiable information when Camarilla believes in good faith that this would be appropriate to enforce Our Terms, protect Ourselves from liabilities, or to defend Ourselves against any third party claims or accusations, or to assist governmental bodies, or to protect the security of Our IT operations.

5.3. Applicable jurisdiction

Camarilla is operated from the Netherlands and the Dutch jurisdiction applies. The Services are hosted on servers of a third party which party and its servers are located in Ireland. Ireland has data protection laws that are as least as strict as those in the Netherlands. If You are a user of Our Services from any other region that applies other laws or regulations regarding personal data collection that differs from the laws in the Netherlands, please be advised that through Your continued use of Our Services, you transfer your personal information to the European Economic Area and by accepting these Privacy Policy you hereby give consent to Us that such transfer shall be governed by Dutch law for these purposes.

5.4. Modifications to this Privacy Policy

Camarilla reserves the right to, at its sole discretion and as a result of changes in laws and regulations or for convenience, review this Privacy Policy. We will always timely indicate the date when the Privacy Policy becomes effective in the document itself. You acknowledge that Your continued use of the Services means that you agree with this Privacy Policy and any amendments.

5.5. Change of control or discontinuation of the Services

In the event that Camarilla would have a change of control (e.g. in the event of acquisition by a third party or a merger) and the legal entity would be consolidated in another company or solely have a change of ownership, We reserve the right to transfer the information that We have collected from You and other users as a part of the process of such sale, merger or other change of control.

In the event that, for whatever reason (e.g. bankruptcy, insolvency, etc), Camarilla would cease to continue its operations we might not be able to fully control the treatment (e.g. transfer or use) of your personal information.

6. How does Camarilla secure your data?

Camarilla acknowledges the importance of security to protect Your data. Therefore, We apply commercially reasonable safeguards to preserve the availability, confidentiality and integrity of Your personal information. We cooperate with an infrastructural provider that is accredited for its information security policy and procedures. Despite Our efforts and Our conviction that we apply top notch security measures, we cannot ensure or warrant the security of any (personal) information that You transmit to Camarilla or to Your Contacts. You do so at Your own risk.

When it comes to security, common sense should prevail. Camarilla does not recommend the usage of public and/or unsecured wireless networks. Upon reception of Your information in our databases via our servers, Camarilla makes commercially reasonable efforts to ensure the security of those servers. However, We give no guarantees or other warranties that this data can not be accessed, deleted or disclosed by a security breach. Should Camarilla be aware of any such breach which results in loss of personal information, We shall make commercially reasonable efforts, by communication via different channels amongst which the Camarilla application and website, to notify You in order for You to be able to take appropriate measures. We are legally obliged to inform the authorities of any material data leak.

To protect Your privacy and security, we apply processes and procedures (such as passwords and in some cases Short Message Service (SMS) authentication) to verify Your identity before registering Your mobile phone number and giving You access to Our Services.

7. Final remarks

7.1. Formal complaints

Should You have any formal complaints about privacy that You wish to resolve amicably, You can direct Your formal complaint to:

Camarilla B.V.

Attn: legal department

Rokin 111

1012KN Amsterdam

THE NETHERLANDS

7.2. Complete agreement

We hereby confirm to You that this Privacy Policy, in combination with the Camarilla Terms, constitute the complete agreement between You and Us.

This Privacy Policy replaces any preceding version.