# **Comica Audio App Privacy Policy**

**Last updated: February 22, 2024**

**Overview**

We fully know the importance of personal information to you, and we appreciate your trust in us. We are committed to maintaining your trust in us, abiding by the following principles, and taking appropriate security measures to protect your personal information: the principle of consistency of rights and responsibilities, the principle of clear purpose, the principle of choice and consent, the principle of minimum necessity, the principle of ensuring safety, the principle of subject participation, the principle of openness and transparency, etc. Please read and understand this *Privacy Policy* (hereinafter referred to as "this Policy") carefully before using our products or services. By this Policy, we will explain how 【Comica Audio】 will collect, store, protect, use, and provide your information to the outside and explain your rights. The key points are as follows:

1. To help you understand the type, scope and purpose of the information, we need to collect the information when you use our services, and we will explain them to you one by one in conjunction with the specific services.

2. In order to provide you with better products and services, we will collect your information in accordance with the principles of legality, legitimacy, and necessity.

3. If we need to share your information with a third party to provide you with better products and services, we will assess the legality, legitimacy, and necessity of the information collected by this third party. We will require the third party to take protective measures for your information and strictly comply with legal requirements.

4. If we need to obtain your information from a third party to provide you with better products and services, we will ask the third party to explain the information sources and ensure the legality of information. If we need to process personal information to conduct our business beyond the scope of your authorization, we will obtain your explicit consent.

5. You can access and manage your information, set privacy features, cancel your account or make complaints through the methods described in this policy.

You can read the relevant chapters according to the index below to further understand the specific provisions of this policy.

1. **How do we collect information**
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Shenzhen Commlite Technology Co., Ltd. (Customer Service Tel: 4008303981, Email : product@comica-audio.com, Official Website: [www.commlite.com](http://www.commlite.com),hereinafter referred to as "we") is fully aware of the importance of personal information to you. We will respect and protect your privacy. When you use our services, we will collect, store, use and provide your information to the outside by this policy. At the same time, we will explain to you through this policy how we provide you with services to access, update, manage and protect your information. **This policy is closely related to the services you use. We recommend that you must carefully read and understand the entire content of this policy, especially the terms that exempt or limit liability, and make the choices you think are appropriate. The terms of this policy that are materially related to your rights, interests and sensitive personal information are marked in bold to draw your attention to them. You have no right to install or use this product or service unless you have read and accepted all the terms of this policy. Once you start using our products or services, it will be deemed that you have accepted and approved the contents of this policy.**

In order to provide you with better products or services, we will collect, store, use and, if necessary, provide your information to the public in accordance with relevant laws. You agree that we can process your information in accordance with the methods agreed in this policy so that you can enjoy a high-quality and convenient service experience while protecting your information security better.

## **How do we collect information**

When you use the various business functions of our products or services (hereinafter referred to as "services"), we need to collect your relevant information to provide you with better services, protect your information security and comply with legal provisions.

**1. Account Registration and Login**

When you register for our product, service account or use our services, you need to use your mobile phone number or email address as your account login name and set an account password. Based on this, we may collect your basic identity information and network identity information. The basic identity information includes mobile phone numbers, mobile phone operator information, and WeChat openId third-party account information. Network identity information includes account name, account password, account nickname, and account avatar.

**2. Use of products or services**

Since you need to connect specific models of microphones, audio interfaces and other devices via Bluetooth through our software products to achieve remote control, parameter adjustment, real-time monitoring and other functions, we may need to collect the following information:

(1) **Personal operation information:** When you use our services, we will collect your use of our services and save them as user operation logs, including your product model, connection status, product usage history data, IP address, language used, date and time of service access, personal operation records, and information obtained through cookies or other technologies, so that we can provide cloud services such as data storage and data recovery, improve our products and services, timely discover and prevent security risks, and help you get a better user experience.

(2) **Device information:** When you use our services, we will collect your personal device information provided by your mobile device or other programs you use to access our services, including the model of your mobile phone or microphone, sound card hardware, operating system version, device configuration, unique device identifier (Android device: app itself, Xiaomi push sdk and BlankjUtilCode read AndroidID, Apple device: app itself reads IOS ID), device environment, IMSI, IMEI, ICCID, mac address, software installation list, device serial number, android ID. We collect device information to uniquely identify you as our user, to provide statistical analysis services, and to improve performance and user experience through application startup data and abnormal error log analysis, to provide better services to users.

(3) **Terminal application information:** To improve user experience, we will collect your relevant terminal application information when you use our services. For example, when you turn on a product service, we will collect information about the product you are connected to in order to accurately match the relevant service. We will only collect your information within the necessary permissions to achieve the service purpose, and use or store your information within the framework of this policy. You can choose to turn off some or all permissions in the settings function of the terminal device. The methods of turning on and off the above permissions may vary on different devices. Please refer to the instructions or guidelines of the terminal device for details.

(4) **Other specific service information:**

A. When you use the service, upload and/or publish, form information and perform related actions (such as feedback service), we will collect the information you upload, publish or form. If the information is from your company or other third parties, you need to ensure that you have obtained their authorization and consent.

**B. When you contact us, we may save your communication/call records, content, contact information, the related information you left, or record the solution and results of the relevant problem, so as to contact you or help you solve the problem. In order to confirm the status of the transaction and provide you with after-sale and dispute resolution services, we will collect your transaction, payment and logistics information related to the progress of the transaction through the trading partners, payment institutions and logistics companies that you have selected based on the transaction, and share your transaction, payment and logistics information with the relevant service providers mentioned above.**

C. When you choose to participate in our marketing activities, we may collect your **name, mailing address, contact information, and payment account number** according to the needs of the activities. This information is the basis for you to receive transfers or gifts. If you refuse to provide this information, we will not be able to transfer money or issue gifts to you, and you may lose relevant rights.

**3. Summary of device permission calls**

**In order to provide you with services and protect the security of your account information, 【Comica Audio】 needs to apply to you for the following permissions within the necessary scope. Please rest assured that we will not enable these permissions by default. We may only collect your information through these permissions if you actively confirm to enable them. It should be noted that obtaining a specific permission does not necessarily mean that we will collect your relevant information; even if you have confirmed to enable the relevant permissions, we will collect your information within the legal, legitimate and necessary scope. For the corresponding permission settings, please refer to the permission setting guidelines for the corresponding functions and the instructions or guidelines of the mobile device and system developers.**

**Read and write storage permissions:** When you install 【Comica Audio】, we will apply for this permission from you in order to ensure the stable operation of 【Comica Audio】. We promise to only read and cache necessary information. If you choose not to enable this permission, you will not be able to use the specific functions related to this permission, but it will not affect your use of other functions provided by 【Comica Audio】.

**Read phone status permission:** When you use the one-click quick login feature of 【Comica Audio】 using your phone number, we will apply for this permission in order to complete the one-click quick login feature. If you choose not to enable this permission, you will not be able to use the specific functions associated with this permission, but it will not affect your use of other functions provided by 【Comica Audio】.

**Network permission:** When you use 【Comica Audio】, we will apply for this permission from you in order to read and update the APP content. If you choose not to enable this permission, you will not be able to use the functions related to this permission, and can only use some functions that can be used offline provided by 【Comica Audio】.

**Bluetooth permission:** When you use the Bluetooth connection of 【Comica Audio】 products, we will apply for this permission from you in order to complete the pairing, connection and control functions of the product. If you choose not to enable this permission, you will not be able to use the specific functions related to this permission, but it will not affect your use of other functions provided by 【Comica Audio】.

**Location permission:** When you use the Bluetooth connection of 【Comica Audio】 products, we will apply for this permission from you in order to complete the Bluetooth search product function. In Android 6.0 and later systems, you must turn on the location permission to search for Bluetooth devices. If you choose not to turn on this permission, you will not be able to use the functions related to this permission, and can only use some of the functions provided by 【Comica Audio】.

**Precise positioning permission:** When you use the 【Comica Audio】 frequency band automatic switching function, we will apply for this permission from you in order to provide the auto-switch position function of the UHF wireless device according to the location. If you choose not to enable this permission, you will not be able to use the functions related to this permission, and can only use some functions provided by 【Comica Audio】.

**Camera permission:** When you use the 【Comica Audio】 product to register and scan code to add products, we will apply for this permission from you in order to complete the product registration and connection functions. If you choose not to enable this permission, you will not be able to use the specific functions related to this permission, but it will not affect your use of other functions provided by 【Comica Audio】.

**Push permission:** When you use the 【Comica Audio】 message system, we will apply for this permission to notify the user in a timely and effective manner when the device is low on battery or in other situations; if you choose not to enable this permission, you will not be able to use the specific functions associated with this permission, but it will not affect your use of other functions provided by 【Comica Audio】.

**4. Your information we obtain from third parties**

We may obtain account information from third parties that you authorize to share, including account name, account nickname, account avatar, etc. We will bind your third-party account to your account after you agree to this policy, so that you can log in directly through the third-party account and use our products or services. We will use your personal information based on the agreement with the third party, the legal confirmation of personal information sources, the relevant laws and regulations.

If we need to obtain your personal information from a third party in order to provide you with services, we will ask the third party to explain the information source and ensure the information legitimacy they provide. If the personal information processing activities we need to carry out for our business exceed the scope of your original authorization to a third party, we will obtain your explicit consent.

**Please be aware that some of the services in 【Comica Audio】 may be provided by our affiliates, partners or other third-party entities. For this reason, 【Comica Audio】 may embed software tool development kits (hereinafter referred to as "SDK") or other similar applications of affiliates, partners or other third-party entities. We will conduct strict security tests on SDK or other similar applications, and require affiliates, partners or other third-party entities to take strict data protection measures to protect your legitimate rights and interests effectively.**

Comica Audio App access to third-party SDK list:

a. io. flutter. embedding: Flutter is an open-source framework from Google for building beautiful, natively compiled multi-platform applications from a single code base. Comica Audio App uses io.flutter.embedding to obtain Android ID information when the app is running and return data to the flutter display layer. The collection method is SDK local collection, and no data sharing is involved.

Privacy Policy: [Flutter - Build apps for any screen](https://policies.google.com/privacy?hl=en)

b. nRFMeshProvision: nRFMesh is an open-source application from Nordic for using the natural advantages of smartphones in Bluetooth mesh network setup and control activities, providing authentication for devices and using a common interface to configure and control nodes. Comica Audio App uses nRFMeshProvision to obtain connected device information when the APP is running and use it for device control. The collection method is SDK native collection, and no data sharing is involved.

Privacy Policy: [Privacy information](https://www.nordicsemi.com/Privacy)

c . iOS-JL\_OTA: iOS-JL\_OTA is an open-source framework of Jieli Technology, which is used to provide OTA upgrade services for device Bluetooth. Comica Audio App uses iOS-JL\_OTA to remotely upgrade the device Bluetooth through the APP. The collection method is SDK local collection, and no data sharing is involved.

Privacy Policy: [Zhuhai Jieli Technology Co., Ltd.](https://www.zh-jieli.com/)

**5. Special instructions**

**In accordance with relevant laws and regulations, we may collect and use your personal information by the law without obtaining your consent in the following circumstances:**

**(1) Related to fulfilling obligations stipulated by laws and industry regulatory authorities;**

**(2) Directly related to national security or national defense security;**

**(3) Directly related to public safety, public health, or major public interests;**

**(4) Directly related to criminal investigation, prosecution, trial and execution of judgment;**

**(5) To protect your or others’ life, property, or other major legal rights and interests, but it is difficult to obtain your consent;**

**(6) The personal information collected is disclosed to the public by you on your initiative;**

**(7) Information from legally disclosed information ;**

**(8) Necessary for signing and performing a contract according to your requirements;**

**(9) Necessary to maintain the safe and stable operation of the products or services provided;**

**(10) Other acts permitted by law.**

**Please understand that the services we provide to you are constantly updated and developed. If you choose to use other services not covered in the above descriptions, and we need to collect your information based on the service, we will explain the scope and purpose of information collection to you through page prompts, interactive processes, agreements and obtain your consent. We will use, store, provide and protect your information by this policy and the corresponding user agreement. If you choose not to provide the aforementioned information, you may not be able to use some or part of the services, but it will not affect your use of other services we offer. In addition, the third-party entities may provide services to you through 【Comica Audio】. When you enter the service page operated by a third-party entity, please note that the relevant services are provided to you by the third-party entity. If it involves the third-party entity collecting personal information from you, it is recommended that you carefully review the privacy policy or agreement of the third-party entity.**

## **How do we store and protect information**

1. Unless otherwise provided by law, the information we collect when providing services to you will be stored in the territory of the People's Republic of China. We will take all necessary measures to ensure that no irrelevant personal information is collected and will only retain your personal information for the period necessary to achieve the purposes stated in this policy (unless the retention period needs to be extended or is permitted by laws and regulations) to protect the security of your personal information. For example, in a technology development environment, we only use de-identified information for statistical analysis; when providing research reports to the outside, we will de-identify the information contained in the reports.

2. To protect the security of your information, we are committed to using various security technologies and supporting management systems to minimize the risk of your information being leaked, damaged, misused, unauthorized accessed, disclosed, and altered. For example:

(1) Use encrypted communication protocols to ensure that data is transmitted in non-plaintext form during transmission;

(2) Perform security reinforcement on the application to ensure that sensitive information cannot be obtained during decompilation;

(3) Industry-standard authorization mechanism to ensure that the operation is initiated by the user;

(4) All data storage is completed on the intranet without public access entrance;

(5) The user's sensitive information (such as mobile phone number, password, etc.) is stored in encrypted form.

3. We comply with the current domestic personal information security laws, have formulated emergency plans for personal information security incidents, and regularly organize internal personnel to conduct emergency response training so that they can master job responsibilities and emergency response strategies and procedures. After an unfortunate information security incident occurs, we will promptly inform you of the basic situation and possible impact, measures we have taken or will take, etc. by legal requirements. We will promptly send you relevant information through APP, SMS, push notifications, etc. When it is difficult to inform you one by one, we will take reasonable and effective ways to issue announcements. If your legal rights and interests are infringed, we will bear the corresponding legal responsibilities.

**4. Please keep your account, password and related identity information safe. When you use our services, we will identify you through your login name or other identity information. Once you leak the above information, you may suffer losses and it may be disadvantageous to you. If you find that your login name or other identity information has been leaked, please contact us immediately so that we can take appropriate measures in time to avoid or reduce related losses.**

**5. After you terminate the use of our services, we will stop collecting and using your information, unless otherwise provided by law. If we cease operations, we will promptly stop collecting your personal information, notify you of the cessation of operations one by one or in the form of an announcement, and delete or anonymize your personal information.**

## **How we use information**

**1. In order to comply with laws and regulatory requirements, provide you with better products and services, and protect the security of your personal information, we will use your information in the following circumstances:**

**(1) To achieve the purposes described in “How We Collect Information” in this Policy;**

**(2) In order to ensure the stability and security of the service and protect your information security, we will use your information for identity authentication, security precautions, monitoring of illegal or suspicious transactions, prevention or prohibition of illegal activities, risk reduction and prevention of risk transmission, archiving and backup purposes;**

**(3) Invite you to participate in surveys or other activities related to our services;**

**(4) We will use methods such as desensitization and de-identification to comprehensively compile statistics, analyze and process your information in order to provide you with more accurate, personalized, smooth and convenient services, or help us evaluate, improve or design our services and operational activities;**

**(5) Other circumstances with your consent.**

2. When we want to use your information for other purposes not specified in this policy, we will obtain your consent again in accordance with legal requirements in the form of confirmation agreements, pop-up prompts, text confirmation actions in specific scenarios, etc.

## **How do we provide information to external parties**

**1. Sharing and entrusting processing**

(1) Sharing with explicit consent. That is, after obtaining your explicit consent, we may share your personal information with third parties and de-identify it when necessary.

(2) We may share your personal information with relevant third parties in accordance with the requirements of laws or regulatory authorities.

(3) To achieve some of the purposes stated in this Policy, some of our services may be provided by third-party partners. We may share your personal information with third-party partners or may entrust a third party to process your personal information with your authorization and consent to provide better customer service and user experience. **We will only share your personal information for legitimate, lawful, necessary, specific and clear purposes, and will only share personal information necessary to provide services. Unless we obtain your permission, we will not use your personal information for purposes or purposes beyond the scope of this Policy.** We require the entities we entrust to process your personal information to process personal information in accordance with the requirements of this Policy, within the scope of your authorization and consent, and any other relevant confidentiality and security measures.

**2. Transfer**

**We will not transfer your personal information to any organization or individual,** except in the following circumstances:

(1) Obtain your explicit authorization or consent in advance;

(2) To meet legal requirements or judicial decisions;

If we or our affiliates are involved in transactions such as mergers, divisions, liquidations, acquisitions or sales of assets or businesses, your personal information may be transferred as part of such transactions. We will ensure the confidentiality of such information during the transfer and require the new entity holding your personal information to continue to be bound by this Policy and inform and obtain your consent in a specific manner.

**3. Public Disclosure**

We will only disclose your personal information in the following circumstances:

(1) Obtain your explicit consent;

(2) When announcing the list of winners, the winners’ mobile phone numbers or account login names will be displayed in an anonymized form;

(3) Based on legal provisions.

**4. Exceptions to prior authorization and consent when sharing, transferring, or publicly disclosing personal information**

**In the following circumstances, sharing, transferring, and publicly disclosing your personal information does not require your prior authorization and consent:**

**(1) Directly related to national security or national defense security;**

**(2) Directly related to public safety, public health, or major public interests;**

**(3) Directly related to criminal investigation, prosecution, trial and execution of judgment;**

**(4) To protect your or other persons’ life, property and other major legal rights and interests, but it is difficult to obtain their consent;**

**(5) Personal information that you disclose to the public on your initiative;**

**(6) Personal information is collected from information that is lawfully disclosed to the public, such as legitimate news reports, government information disclosure, and other channels.**

**( 7 ) Other circumstances prescribed by law.**

**You understand and acknowledge that sharing or transferring personal information that has been de-identified and ensuring that the data recipient cannot restore and re-identify the subject of the personal information does not constitute external sharing, transfer or public disclosure of personal information, and such storage and processing will not require additional notification to you and your consent.**

## **How do you access and manage your information**

1. You can log in to your account through 【Comica Audio】 and check and modify your personal information in 【My】 - 【My Account】. If you need to modify your login account information, for the sake of user data security and identity identification or in accordance with legal requirements, you need to pass the verification before you can modify the relevant information you have authenticated.

2. You can modify your authorization scope in the following ways: 1. Cancel the relevant permissions in the system application settings; 2. Cancel the relevant permissions in 【Sidebar】 - 【App Settings】 - 【Privacy Settings】. After you cancel the authorization for information collection, we will no longer collect the information; after you cancel the authorization to share information with a third party, we will no longer provide information to the third party in this business scenario. **Please be aware that if you cancel the relevant authorization scope, it may affect the use of the product or service functions related to the authorization scope, but will not affect the use of other functions.**

3. Each business function requires some basic personal information to be completed. You can give or withdraw your authorization consent for the collection and use of additional personal information at any time. You can cancel your account in the following ways: Cancel your account in 【Sidebar】 - 【App Settings】 - 【Account Security】. **Please be aware that when you actually cancel your account, all information in your account will be permanently cleared, and we will not collect, use or provide personal information related to the account.** However, we still need to save the information provided or generated during your use in accordance with regulations.

4. You may request us to delete your personal information in the following circumstances:

(1) If our handling of personal information violates laws and regulations;

(2) If we collect and use your personal information without obtaining your consent;

(3) If our handling of personal information violates our agreement with you;

(4) If you no longer use our products or services, or you cancel your account;

(5) If we no longer provide products or services to you.

If we decide to respond to your deletion request, we will also notify the entities that obtained your personal information from us and request them to delete it in a timely manner, unless otherwise provided by laws and regulations, or these entities obtain your independent authorization. When you delete information from our services, we may not immediately delete the corresponding information from the backup system, but we will delete the information when the backup is updated.

5. If you find that our collection and use of your personal information violates the law, you can contact us and request the deletion of the relevant information. **Our customer service phone number is 4008303981.**

**6. Despite the above agreement, in accordance with the laws and regulatory requirements of the competent authorities, we may not be able to respond to your request in the following circumstances:**

**(1) Directly related to national security or national defense security;**

**(2) Directly related to public safety, public health, or major public interests;**

**(3) Directly related to criminal investigation, prosecution, trial and execution of judgment;**

**(4) There is sufficient evidence that you have subjective malice or abuse of rights;**

**(5) responding to your request will cause serious damage to the legitimate rights of other individuals or organizations;**

**(6) Involving trade secrets;**

**(7) Other circumstances prescribed by law.**

## **The Statement on Third-Party Liability**

**Please note that the products and services we provide to you may be connected to third-party services, and the third party may have its own privacy protection policy. When you view and use third-party services, the third party may place their own cookies or other similar tools that are not controlled by us and are not subject to this policy. We will strive to require these third parties to take protective measures for your information, and we recommend that you contact them to obtain details of their privacy protection policies. If you find that there are risks in third-party applications or tools, it is recommended to terminate the relevant operations to protect your legal rights.**

## **How do we protect the information of minors**

Our products and services are mainly for adults. Minors should not create their own personal information subject accounts without the supervision of their parents or other guardians. We attach great importance to the protection of minors' information. If you are a minor as defined by the laws of your country, please obtain the consent of your parents or other guardians before using our products and services. We recommend that your parents or other guardians read this policy carefully.

**Once you download, install, or use any part or all of our products or services in any way, it means that your parents or other guardians agree to your use of our products or services and acknowledge the entire contents of this policy. If parents or other guardians have reason to believe that the minor has submitted personal information of the minor to us without their prior consent, please contact us to ensure that such personal information is deleted.**

## **The Application and Update of Policy**

**The policy applies to all our products or services, unless the relevant service has an independent privacy policy or special provisions in the corresponding user service agreement.**

**We will update this policy promptly when we find the following situations:**

**(1) Changes in our basic conditions, such as changes in ownership due to acquisitions, mergers, or reorganizations;**

**(2) The object, scope, or purpose of providing personal information to external parties has changed;**

**(3) The scope, purpose, or rules for collecting, storing, or using personal information have changed;**

**(4) The way you access and manage your personal information changes;**

**(5) There are changes in the channels and mechanisms for user inquiries and complaints, as well as external dispute resolution agencies and contact information;**

**(6) Other changes that may have a significant impact on your personal information rights and interests.**

**If this policy is updated, we will inform you through APP push notifications, pop-up window prompts, etc. For timely notifications, it is recommended that you notify us promptly when your contact information changes. If you continue to use our products or services after this policy is updated, it means that you have fully read, understood and accepted the updated policy and are willing to be bound by the updated policy.**

**You can review the full text of this policy in** 【**Sidebar**】 **-** 【**App Settings**】 **-** 【**Privacy Settings**】**. We encourage you to review our privacy policy every time you use our products or services.**

## **Others**

**1. We have the right to modify the terms of this Agreement when necessary. We will publish the changes to this policy on this page, and you can check the relevant terms of the agreement in the latest version of this software. If you do not accept the modified policy /agreement, that is, you do not explicitly agree to the new privacy policy of this software, you should stop using this software. Without your explicit consent, we will not reduce the rights you should enjoy under the original policy.**

**2. If you have any opinions about our services, we welcome your feedback; if there is any dispute or controversy between you and us, we will resolve it through friendly negotiation. If it still cannot be resolved, you can seek a solution through the People's Court with jurisdiction over our location and the laws of mainland China will apply. The feedback channel is 【 】 and the time you can receive a response is 【 】.**

3. The titles of all clauses in this Agreement are for reading convenience only and have no actual meaning in themselves and cannot be used as the basis for interpreting the meaning of this Agreement.

**4. Regardless of the reason why any provision of this Agreement is invalid or unenforceable in part, the remaining provisions shall remain valid and binding on both parties.**

**5. After obtaining your authorization and consent, your personal information may be transferred from the territory of the People's Republic of China to the country/region where you use the products or services. If the laws of your country conflict with the provisions of this Agreement, please inform us immediately and without hesitation, and we will try to protect your legal rights and interests in accordance with the laws of your country. Unless otherwise provided by law, "your country" mentioned in this Agreement refers to the relevant laws of the country where you habitually reside.**