

# Privacy Notice

Effective Date: January, 2026

This Privacy Notice ("Privacy Notice" or "Notice") describes how OceanInnov LinkSoft Limited ("we", "us", or "our") collects, uses, discloses, stores, retains, protects or otherwise processes your information when you visit or use the Heart Monitor: Track & Care ("App" or "Service"). Please read this Privacy Notice carefully. By continuing to interact with the App, you are consenting to the practices described in this Notice.

We may amend this Notice from time to time by posting a revised version and updating the "Effective Date" above. The revised version will be effective on the "Effective Date" listed. If you disagree with these changes, you may stop using our App at any time. Your continued use of our App constitutes your consent to any amendment of this Notice.

- **Information We collect about You**

We collect information about you, including:

- a) Your name, telephone number and email address.
- b) IP addresses.
- c) Personal info related to your use of the App, including but not limited to your gender, age, height, weight, blood pressure, blood oxygen, blood sugar, heart rate data, and other related and similar info you may record via the App. The type of personal data mentioned above will be stored only on your own device locally and can't be transferred to us or any third parties, unless you share it on your own.
- d) The camera permission of your device granted by you to measure your heart rate and HRV data. After the permission granted to us, we may access to the camera on your device, however we will not collect, use or store any info from your camera outside the App on your device. Please note that the camera on your device cannot perform any medical-grade measurements and therefore the results given by the App cannot be used as a reliable basis for determining your health condition.
- e) Other information about you, such as physical and health-related information, photographs.
- f) Device information includes device types and settings, device identifiers (such as

IDFA, IDFV for Android, GAID for IOS), browser types, mobile, wireless, operating system versions, another network information (such as internet service provider name, carrier name and signal strength), and application version numbers.

- g) Activity information directly related to your use of the App, includes contact list and or photos.
- h) Usage information includes the pages of our App you visit, the time and date of your visit, the time spent on those pages, unique device identifiers another diagnostic data.

- **Purposes for Using Your Information**

We may collect and use your information for the following reasons:

- a) Providing, maintaining, and improving our Services and determining whether the Services are available.
- b) Improving, personalizing, and facilitating your use of our App.
- c) Measuring, tracking, and analyzing trends and usage in connection with your use or the performance of our App.
- d) Sending you surveys and getting your feedback about our App.
- e) Conducting investigations, complying with and enforcing any applicable laws, regulations, legal requirements, and industry standards, and responding to lawful requests for information from the government or to valid legal process.
- f) Debugging to identify and fix errors that impair how our App function.
- g) Investigating, detecting, preventing, recovering from, or reporting fraud, misrepresentations, security breaches or incidents, or other potentially prohibited, malicious, or illegal activities.

- **Disclosure of Your Information**

We share your personal information only as described below and with third parties that either are subject to this Notice or follow practices at least as protective as those described in this Notice.

- a) With our group companies and corporate affiliates.
- b) With service providers who help us to provide, maintain, and improve our App, including service providers who access your information to perform services on our behalf (e.g., vendors who help us with fraud prevention).
- c) When we believe disclosure is appropriate to comply with applicable law, regulations, legal process or governmental request; enforce or comply our

Terms and Conditions and other agreements; or protect our or our users' rights, property, or safety.

- **Choices You Have**

Depending on the jurisdiction in which you reside, you may be entitled under applicable law to request:

- a) Access to your personal data, including the types of data we have collected, the purposes for collecting such data, the types of data we have shared and which parties we have shared with the data, and in a portable format.
- b) Delete your personal data.
- c) Correct your incorrect personal data.
- d) Withdraw your consent at any time.

We will not discriminate against you if you exercise these privacy rights, or deny, charge different prices for, or provide a different quality of Services if you choose to exercise these rights.

- **Information Retain**

We will retain or keep your information as long as is necessary for the purposes identified in this Notice. After that we may delete your information or keep it for as long as we need it to do things like fight fraud, resolve disputes with (or involving) you, follow the law, enforce our agreements and defend our rights in court.

- **Information Protection**

We will do our best and take reasonable measures, including administrative, technical, and physical safeguards, to protect or secure your information from loss, theft, and misuse, and unauthorized access, disclosure, alteration, and destruction. However, we cannot guarantee absolute security of the storage of your information because the internet is not a 100% secure environment.

- **Children's Privacy**

The App is general audience services not directed at children under the age of 13, and we do not knowingly collect, share, or sell any information from children under the age of 13. If we learn that any information we collect has been provided by a child under the age of 13, we will promptly delete that information.

- **Links to Third Party Websites**

The App may contain links and other pointers that connect to external websites operated by third parties ("Third Party Sites"). We do not control the Third Party Sites and are not responsible or liable for the data they collected, their privacy practices, the contents of, or any link contained in, a Third Party Site. Links to Third Party Sites are provided solely for your convenience and do not indicate, expressly or impliedly, any endorsement by us of the Third Party Site or privacy practices, the products or services provided at those sites. Access to any Third Party Site is at your sole risk. This Notice does not apply to information we collect by other means or from other sources other than through the App. Please read the privacy policies and terms of use of Third Party Sites carefully before you interact with them.

- a) Facebook: [www.facebook.com/privacy/policy/?entry\\_point=comet\\_dropdown](http://www.facebook.com/privacy/policy/?entry_point=comet_dropdown)
- b) Google Admob/Firebase: [policies.google.com/privacy?hl=en](http://policies.google.com/privacy?hl=en)
- c) Appsflyer: [www.appsflyer.com/legal/privacy-policy](http://www.appsflyer.com/legal/privacy-policy)
- d) Applovin/Max: [www.applovin.com/privacy](http://www.applovin.com/privacy)
- e) Mintegral: [www.mintegral.com/cn/privacy](http://www.mintegral.com/cn/privacy)
- f) Pangle: [www.pangleglobal.com/zh/privacy/partner-en](http://www.pangleglobal.com/zh/privacy/partner-en)
- g) Inmobi: <https://www.inmobi.com/privacy-policy>
- h) Vungle: <https://liftoff.io/privacy-policy/>

- **Contact Us**

Please contact our team with any questions or concerns regarding this Notice:  
[Jadefeng@oceanInnovls.com](mailto:Jadefeng@oceanInnovls.com)