

# Privacy Policy of Pictory

Last Updated: 2026/05/06

---

## 1. Introduction

This Privacy Policy (“Policy”) explains how **WONG KA HO**, acting as a sole proprietor registered in Hong Kong and the owner of the Pictory platform (the Pictory website <https://pictory.net/> and Pictory mobile app) collects, processes, stores, and protects both personal and non-personal data of users.

This Policy applies to all services operated by WONG KA HO, including:

- the **Pictory mobile application** (the “App”), available via Google Play;
- the **website located at <https://pictory.net/>** and its subdomains (the “Website”);

(collectively referred to as the “Services”).

By accessing or using our Services, you acknowledge that you have read and understood this Policy and agree to the collection and use of information in accordance with it. If you do not agree with any part of this Policy, you must discontinue use of the Services immediately.

Pictory platform provides AI-powered tools for creating, editing, enhancing, and transforming visual content, including images and short-form media. Our Services are designed for lawful, creative, and personal use.

We are committed to ensuring transparency, protecting user privacy, and maintaining a high standard of data security. This Policy is designed to comply with applicable laws and regulations of **Hong Kong**, as well as internationally recognized data protection principles, including the **General Data Protection Regulation (GDPR)** where applicable.

If you have any questions regarding this Policy or how your data is handled, please refer to the contact details provided in **Section 17 (Contact Information)**.

---

## 2. Information We Collect

To provide, maintain, and improve our Services, Pictory platform collects certain categories of information. We follow the principle of data minimization and only collect information that is necessary for the proper functioning of the Services.

### 2.1 Information Provided Directly by You

When you interact with Pictory, you may voluntarily provide:

- **Account Information:** such as your email address, username, and login credentials when creating an account.

- **Payment Information:** subscription and purchase data processed via **Google Play Billing**. We do not store full payment card details.
- **User Content:** images, photos, prompts, or other media files that you upload, generate, or edit within the App.
- **Communications:** messages you send to us via email (e.g., support@pictery.net) or through support forms.

## 2.2 Information Collected Automatically

When you use our Services, certain information is collected automatically:

- **Device Information:** device model, operating system, language settings, and unique device identifiers.
- **Usage Data:** interaction with features, session duration, actions performed within the App (e.g., applying filters, generating content), and crash logs.
- **Log Data:** IP address, access times, and diagnostic data for security and performance monitoring.
- **Cookies and Similar Technologies (Website only):** used to ensure proper functionality, remember preferences, and improve user experience.

## 2.3 Information from Third Parties

We may receive limited information from trusted third-party providers:

- **Google Play Services:** for installation data, subscription validation, and purchase confirmations;
- **Analytics Providers:** aggregated and anonymized usage statistics;
- **Advertising Platforms (e.g., Google Ads):** performance and conversion data in a non-identifiable format.

We do not purchase personal data from third parties and only process such data in accordance with this Policy.

---

## 3. How We Use Your Information

Pictery processes collected information to operate, improve, and secure the Services. The purposes include:

### 3.1 Service Operation and Functionality

- To provide core features of the App, including AI-powered image processing and editing;
- To create and manage user accounts;

- To process subscriptions and verify purchases through Google Play;
- To enable saving, exporting, or sharing of generated content;
- To provide customer support and respond to inquiries.

### **3.2 Personalization and Improvement**

- To improve AI models, features, and user interface based on aggregated usage patterns;
- To personalize the user experience, including recommendations of tools and effects;
- To analyze performance, detect bugs, and optimize application stability.

### **3.3 Security and Fraud Prevention**

- To detect, prevent, and investigate unauthorized access, abuse, or fraudulent activity;
- To ensure safe operation of the Services and protect user data;
- To enforce our Terms of Service and platform rules.

### **3.4 Legal and Compliance Purposes**

- To comply with applicable legal obligations under Hong Kong law and international regulations;
- To respond to lawful requests from authorities;
- To protect our rights, property, and intellectual assets.

Pictory does **not sell or rent personal data** to third parties. All processing activities are conducted in a lawful, fair, and transparent manner.

---

## **4. Legal Basis for Processing Personal Data**

Pictory operates globally and may process personal data of users located in different jurisdictions, including the European Economic Area (EEA). Where applicable, we process personal data in accordance with the **General Data Protection Regulation (GDPR)** and other relevant laws.

We rely on the following legal bases:

### **4.1 Performance of a Contract**

We process personal data when it is necessary to provide the Services requested by you, including:

- creating and maintaining your account;
- enabling access to App features;

- processing subscriptions and purchases;
- delivering customer support.

Without this data, we cannot provide essential functionality of the Services.

#### **4.2 Consent**

In certain cases, we rely on your explicit consent, including:

- sending optional communications (e.g., updates or promotional messages);
- collecting analytics data beyond strictly necessary scope;
- accessing device features such as storage, camera, or media files;
- using cookies and similar technologies on the Website.

You may withdraw your consent at any time without affecting the lawfulness of prior processing.

#### **4.3 Legitimate Interests**

We may process limited data where necessary for our legitimate interests, provided such interests are not overridden by your rights and freedoms. These include:

- improving product performance and user experience;
- ensuring platform security and preventing fraud;
- developing new features and functionality.

#### **4.4 Legal Obligations**

We may process personal data where required to comply with applicable legal or regulatory obligations, including:

- tax and accounting requirements;
- responding to lawful requests from authorities.

#### **4.5 Vital Interests**

In rare situations, we may process personal data to protect vital interests of users or others, such as preventing security threats or abuse.

We ensure that all processing activities are limited to what is necessary and are conducted in a transparent and responsible manner.

---

### **5. Data Sharing and Disclosure**

Pictory does not sell, rent, or trade personal data. However, we may share limited information under the following circumstances:

## 5.1 Service Providers and Technical Partners

We may share data with trusted third-party providers who support the operation of our Services, including:

- **Cloud hosting providers** for secure storage and processing;
- **Payment processors (Google Play Billing)** for subscription handling;
- **Analytics services** for performance and usage insights;
- **Customer support tools** for handling user inquiries.

All such providers are contractually obligated to:

- process data only for specified purposes;
- maintain strict confidentiality;
- implement appropriate security measures;
- comply with applicable data protection laws.

## 5.2 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of assets, user data may be transferred as part of that transaction. Users will be notified in advance if their data becomes subject to a different privacy policy.

## 5.3 Legal Requirements and Protection

We may disclose personal data if required to do so by law or if we believe such action is necessary to:

- comply with legal obligations;
- respond to lawful requests from authorities;
- protect our rights, property, or safety;
- prevent fraud, abuse, or security threats.

## 5.4 Aggregated and Anonymized Data

We may share aggregated or anonymized data that does not identify individual users. This may include statistical information used for research, analytics, or improving the Services.

Pictory remains responsible for ensuring that any data shared on its behalf is handled in accordance with this Policy and applicable laws.

---

## 6. Data Retention

Pictory retains personal and non-personal data only for as long as necessary to fulfill the purposes described in this Policy, comply with legal obligations, and resolve disputes. We regularly review our data retention practices to ensure that information is not stored longer than required.

### 6.1 General Retention Principles

- **Account Information:** retained for the duration of your active account. Upon account deletion, data is erased or anonymized within a reasonable timeframe, unless retention is required by law.
- **Payment and Transaction Data:** retained only as necessary for billing, accounting, and compliance purposes. Full payment card details are never stored on our systems.
- **User-Generated Content:** images, media, and AI-generated content are processed to provide functionality and are not stored permanently on our servers unless required for technical operation (e.g., temporary caching or synchronization).
- **Support Communications:** correspondence with support may be retained for a limited period (typically up to 12 months) to ensure service quality.

### 6.2 Marketing and Communication Data

Contact details used for optional communications are retained only until you withdraw consent or unsubscribe. After that, such data is deleted or anonymized.

### 6.3 Technical and Log Data

Technical logs, diagnostics, and performance data are retained for a limited period (typically 6–12 months) unless required for security investigations or legal compliance.

### 6.4 Legal and Regulatory Requirements

Certain data may be retained longer where required by applicable laws, including accounting and tax regulations under Hong Kong law or other jurisdictions.

### 6.5 Secure Deletion and Anonymization

When data is no longer required, we use industry-standard methods to securely delete or anonymize it. This includes removing identifiers and ensuring that data cannot be reconstructed or linked to an individual.

Our principle is simple: **we retain only what is necessary, for as long as necessary.**

---

## 7. International Data Transfers

Pictory operates globally, and your information may be processed in different countries depending on the infrastructure and service providers used.

### 7.1 Locations of Processing

Your data may be processed in:

- the **European Economic Area (EEA)**;
- the **United States**;
- other jurisdictions where our trusted service providers operate.

These locations may have different data protection laws than your country of residence.

### 7.2 Safeguards for Transfers

To ensure an adequate level of protection, we implement appropriate safeguards, including:

- **Standard Contractual Clauses (SCCs)** approved by the European Commission;
- **Data Processing Agreements (DPAs)** with all third-party providers;
- **Technical protections**, such as encryption in transit and at rest, access control, and secure infrastructure.

### 7.3 User Acknowledgment

By using the Services, you acknowledge that your data may be transferred to and processed in countries outside your jurisdiction.

Regardless of location, we ensure that your data is protected in accordance with this Policy and internationally recognized privacy standards.

### 7.4 Third-Party Providers

We require all third-party providers to:

- process data only for defined purposes;
- implement appropriate security measures;
- comply with applicable data protection laws and standards.

Pictory ensures that international data transfers do not compromise user privacy or security.

---

## 8. Data Security

Pictory implements appropriate technical, organizational, and administrative measures to protect personal data against unauthorized access, loss, misuse, or alteration. We continuously review and improve our security practices to align with industry standards.

## 8.1 Technical Safeguards

- **Encryption:** All data transmitted between your device and our servers is protected using secure encryption protocols (e.g., TLS/SSL).
- **Secure Infrastructure:** Our systems are hosted in secure environments with access control, firewalls, and monitoring systems.
- **Access Controls:** Access to personal data is restricted to authorized personnel only, based on role and necessity.
- **Monitoring and Testing:** We perform regular system monitoring, security assessments, and updates to detect and address vulnerabilities.
- **Data Integrity and Backup:** We maintain secure backup systems to prevent data loss and ensure service continuity.

## 8.2 Organizational Measures

- **Confidentiality Obligations:** Personnel handling user data are bound by confidentiality obligations.
- **Internal Policies:** We maintain internal procedures governing data handling, storage, and deletion.
- **Incident Response:** In case of a security incident, we take prompt action to contain the issue, investigate the cause, and apply corrective measures.

## 8.3 User Responsibility

Users also play a role in maintaining security. You are responsible for:

- keeping your account credentials confidential;
- using strong passwords;
- protecting your device from unauthorized access;
- notifying us immediately if you suspect unauthorized use of your account.

While we take reasonable steps to protect your data, no method of transmission or storage is completely secure. Therefore, absolute security cannot be guaranteed.

---

## 9. Your Rights

Depending on your location, you may have certain rights regarding your personal data under applicable data protection laws, including the GDPR.

### 9.1 Right of Access

You may request confirmation of whether we process your personal data and obtain a copy of such data, along with information about how it is used.

## **9.2 Right to Rectification**

You have the right to request correction of inaccurate or incomplete personal data.

## **9.3 Right to Erasure**

You may request deletion of your personal data where:

- it is no longer necessary for the purposes collected;
- you withdraw consent;
- processing is unlawful.

## **9.4 Right to Restrict Processing**

You may request that we limit processing of your data under certain conditions, such as when you contest its accuracy.

## **9.5 Right to Data Portability**

Where technically feasible, you may request a copy of your data in a structured, commonly used format or request transfer to another provider.

## **9.6 Right to Object**

You may object to processing based on legitimate interests or direct marketing purposes. We will cease processing unless there are compelling legitimate grounds.

## **9.7 Right to Withdraw Consent**

Where processing is based on consent, you may withdraw it at any time.

## **9.8 Automated Decision-Making**

If automated systems (including AI-based features) are used, you have the right to request clarification or human review where applicable.

Pictery respects user rights regardless of location and aims to respond to all valid requests promptly and transparently.

---

## **10. Exercising Your Rights**

Pictery provides clear and accessible ways for users to exercise their data protection rights.

### **10.1 How to Submit a Request**

To exercise any of your rights described in Section 9, you may contact us via:

- Email: [support@pictery.net](mailto:support@pictery.net)

Please include sufficient details to identify your request (e.g., “Privacy Request” in the subject line).

For security purposes, we may request verification of your identity before processing your request. This may include confirming your email address or providing limited additional information. Such data will be used solely for verification and deleted afterward.

## **10.2 Response Timeframes**

We aim to respond to all valid requests within **30 calendar days**.

If a request is complex or requires additional time, we may extend the response period as permitted by applicable law. In such cases, we will notify you in advance.

## **10.3 Limitations**

We may decline or limit a request where:

- fulfilling it would infringe on the rights of others;
- we are legally required to retain the data;
- the request is excessive or repetitive.

In all cases, we will provide an explanation.

## **10.4 Fees**

We do not charge a fee for standard requests. However, we may charge a reasonable administrative fee for repetitive or excessive requests, where permitted by law.

## **10.5 Complaints**

If you believe your rights have been violated, you may contact us directly. You may also have the right to lodge a complaint with a relevant data protection authority.

We encourage users to contact us first so we can resolve the issue promptly.

---

## **11. Cookies and Similar Technologies**

Pictory uses cookies and similar technologies on the Website to ensure functionality, analyze usage, and improve user experience.

### **11.1 What Are Cookies**

Cookies are small text files stored on your device when you visit a website. They help remember preferences and improve functionality.

### **11.2 Types of Cookies We Use**

- **Strictly Necessary Cookies:** required for basic website functionality;
- **Performance and Analytics Cookies:** help us understand how users interact with the Website;
- **Functional Cookies:** remember user preferences such as language or settings;

- **Advertising Cookies:** may be used to measure the effectiveness of advertising campaigns;
- **Third-Party Cookies:** set by external services such as analytics providers.

### 11.3 Cookie Management

You can manage or disable cookies through your browser settings. Please note that disabling certain cookies may affect Website functionality.

### 11.4 Consent

Where required by law, we obtain your consent before using non-essential cookies. You may withdraw your consent at any time.

### 11.5 Cookies in the App

The mobile App does not use traditional browser cookies. Instead, it may use local storage or system-level mechanisms to support functionality (e.g., saving preferences). Such data does not contain sensitive personal information and is removed when the App is uninstalled.

---

## 12. Tracking, Analytics, and Third-Party Tools

To improve functionality, performance, and user experience, Pictery uses a limited number of trusted third-party analytics and diagnostic tools.

### 12.1 Purpose of Analytics

We use analytics tools to:

- understand how users interact with the App and Website;
- measure feature usage and performance;
- detect technical issues, crashes, and errors;
- improve overall usability and stability;
- evaluate the effectiveness of marketing campaigns.

We do **not** use analytics to identify individual users. Data is processed in aggregated or pseudonymized form wherever possible.

### 12.2 Types of Tools Used

Pictery may use:

- **Google Analytics / Firebase Analytics:** for aggregated usage data, session tracking, and crash reporting;
- **Google Ads Conversion Tracking:** to measure the performance of advertising campaigns;

- **Performance Monitoring Tools:** to evaluate system responsiveness and stability.

All tools are configured to limit data collection to what is necessary for their intended purpose.

### **12.3 Data Collected by Analytics Tools**

Depending on the tool, collected data may include:

- device type, operating system, and version;
- general location derived from IP address (not precise location);
- session duration and in-app interactions;
- anonymized or pseudonymous identifiers (such as advertising IDs).

We do **not** share personally identifiable information (such as name or email) with analytics providers.

### **12.4 Advertising and User Control**

In the free version of the App, users may see advertising content provided by third-party networks.

Users can manage ad personalization settings through their device:

- Android: “Opt out of Ads Personalization” in system settings.

Users may also limit tracking through browser settings or available opt-out tools.

### **12.5 Transparency and Responsibility**

We disclose all analytics and tracking practices in this Policy. Third-party providers are required to comply with applicable data protection laws and process data only for specified purposes.

Our goal is to improve the Services — not to exploit personal data.

---

## **13. Third-Party APIs & Integrations**

Pixflame enhances its functionality through carefully selected third-party **APIs** and integrations. These integrations enable high-quality editing effects, secure payments, and seamless sharing options — all while maintaining strict privacy and data minimization standards.

### **13.1 Purpose of Integrations**

Pictory integrates with selected third-party services to enable core functionality and improve user experience.

### **13.1 Purpose of Integrations**

We use third-party APIs to provide:

- **AI-powered image processing and enhancement features;**
- **Cloud-based functionality** (where applicable for processing or temporary storage);
- **Payment processing via Google Play Billing;**
- **Optional sharing features** to external platforms (initiated by the user).

### 13.2 Data Handling Principles

When interacting with third-party services:

- only minimal data necessary for functionality is transferred;
- all data is transmitted via secure encrypted connections;
- data is not used for unrelated purposes;
- third-party providers are required to maintain confidentiality and security.

### 13.3 Types of Third-Party Services

Pictery may rely on:

- **Google Services (Firebase, Google Play):** for analytics, notifications, and billing;
- **Cloud infrastructure providers:** for processing and performance optimization;
- **AI processing frameworks:** enabling generation and transformation of visual content.

All partners are selected based on reliability, security, and compliance standards.

### 13.4 User Control

Certain integrations (such as sharing content) require explicit user action. You can control permissions via your device settings and revoke access at any time.

Pictery ensures that third-party integrations are used solely to enhance functionality and do not compromise user privacy.

---

## 14. App Store & Google Play Compliance

Pictery is developed, distributed, and maintained in compliance with applicable platform policies, including **Google Play Developer Program Policies** and related user data requirements.

### 14.1 Policy Compliance

We adhere to:

- Google Play User Data Policy;

- Google Play Payments Policy (all in-app purchases are processed via Google Play Billing);
- applicable advertising and data transparency requirements.

We regularly review our Services to ensure ongoing compliance with platform standards.

#### **14.2 Content Standards**

Pictory does not promote or distribute:

- misleading or deceptive content;
- illegal, harmful, or infringing materials;
- content that violates intellectual property rights.

All features are designed for lawful, creative use, allowing users to edit and generate visual content responsibly.

#### **14.3 Permissions and Data Transparency**

We request access only to permissions necessary for core functionality, such as:

- access to photos/media for editing;
- storage access for saving generated content.

Users are informed about the purpose of each permission and may revoke access at any time.

#### **14.4 Accurate Representation**

All descriptions, screenshots, and promotional materials accurately reflect the App's functionality. We do not use misleading claims or deceptive practices.

#### **14.5 Security and Integrity**

We ensure that:

- the App is free from malicious code;
- no hidden tracking or unauthorized data collection occurs;
- all third-party integrations comply with platform requirements.

Pictory continuously monitors policy updates to maintain full compliance and user trust.

---

### **15. Children's Privacy**

Pictory is not intended for use by children under the age of **13** (or a higher age where required by local laws, such as 16 in certain jurisdictions).

#### **15.1 No Intentional Collection**

We do not knowingly collect or process personal data from children. If a user does not meet the minimum age requirement, they must not use the Services.

### **15.2 Parental Awareness**

If a parent or guardian believes that a child has provided personal data to us, they should contact us immediately. We will take appropriate steps to remove such data.

### **15.3 Protective Measures**

If we become aware that data from a minor has been collected without appropriate consent, we will:

- delete the data promptly;
- restrict or disable the associated account.

Pictory encourages the use of parental control tools available on mobile devices.

---

## **16. Amendments to This Privacy Policy**

Pictory reserves the right to update or modify this Privacy Policy at any time to reflect changes in legal requirements, business practices, or the functionality of the Services.

### **16.1 Notification of Changes**

When material changes occur, we may notify users through:

- updates on the Website;
- in-app notifications;
- email notifications (where applicable).

The updated version will always include a revised **“Last Updated”** date.

### **16.2 Nature of Changes**

Updates may include:

- clarification of existing provisions;
- changes required by new legal or regulatory requirements;
- updates related to new features or integrations;
- modifications to contact or business information.

We ensure that updates do not reduce the level of data protection provided to users.

### **16.3 Continued Use**

By continuing to use the Services after updates take effect, you agree to the revised version of this Privacy Policy.

If you do not agree with the updated Policy, you should discontinue use of the Services and may request deletion of your data.

---

## **17. Contact Information**

If you have any questions, requests, or concerns regarding this Privacy Policy or your personal data, you may contact us using the details below:

**Legal Entity:** WONG KA HO

**Registered Address:**

FLAT/RM 2 10/F THE CLOUD  
NO. 111 TUNG CHAU STREET  
TAI KOK TSUI, KOWLOON  
HONG KONG

**Email:** support@pictery.net

**Phone:** +852 9740 2890

We aim to respond to all legitimate requests within a reasonable timeframe, typically within **30 calendar days**.

If you believe your data protection rights have been violated, you may also contact the relevant supervisory authority in your jurisdiction.