SWOOVY'S PRIVACY COMMITMENT

Swoovy is committed to your privacy. We design, develop and provide our services and products with privacy and security as key priorities.

Privacy takes a team effort. We work across our company to ensure that your overall experience with Swoovy is private and secure.

Clear communication. We understand how challenging it is in today's world to get clear information and answers about privacy. Our goal is to keep our communications with you clear and easy to understand with our corporate policies.

PRIVACY POLICY

Our approach to privacy is noted below. We're focused on making Swoovy a great application for you and utilize different types of data collection, analysis and potentially sharing information with key partners as part of that process.

The effective date of this Privacy Policy is August 27, 2018.

<u>EFFECTIVE DATE:</u> August 27, 2018

1. [OUR COMPANY](#)

2. [WHERE THIS PRIVACY POLICY APPLIES](#)

3. [COLLECTING INFORMATION](#)

4. [COOKIES AND SIMILAR DATA COLLECTION TYPES](#)

5. [HOW SWOOVY USES YOUR INFORMATION](#)

6. [SHARING YOUR INFORMATION](#)

7. [YOUR RIGHTS](#)

8. [RESIDENTS OF CALIFORNIA](#)

9. [PROTECTING YOUR INFORMATION](#)

10. [RETAINING YOUR INFORMATION](#)

11. [SWOOVY IS FOR ADULTS ONLY](#)

12. [PRIVACY POLICY UPDATES](#)

13. [THIRD-PARTY LINKS](#)

14. [HOW TO CONTACT US](#)

1. OUR COMPANY

The company that is responsible for your information under this Privacy Policy is Swoovy Inc. ("Swoovy," "us," or "we"), which is based in Austin, Texas.

2. WHERE THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to websites, apps, events and other services operated by Swoovy. We refer to all of these as our "services" in this Privacy Policy. We will also refer to our Privacy Policy in other Swoovy documentation.

Swoovy also works with different service providers which may have their own privacy policies. In those cases, their privacy policy applies.

3. COLLECTING INFORMATION

Swoovy is dedicated to helping you make meaningful connections with people as well as nonprofit organizations and their affiliates. We utilize technology to make the whole process much easier and effective. Part of this process is to have you provide us with information so we can customize your experience. We also collect information to continue to improve your experience and our services when you use our application and participate in events. We have more details about our approach in this agreement.

Information you share with Swoovy

We ask for information to enhance your user experience including:

- Basic information about you (gender, age, etc.).

- Over time we may request additional information from you to continue to customize and improve your experience with Swoovy. This can include things like photos, videos, interests, your personality, and your lifestyle. You consent to providing us with this information when you provide it to us.

- Any time you subscribe to a paid service or make a purchase from Swoovy (rather than services based on iOS or Android), you will provide Swoovy or our payment service provider with the payment details needed to complete the purchase.

- We may conduct contests, promotions, surveys and other activities where we solicit your feedback and capture registration information.

- We also capture information when you communicate with our company and customer service to improve our products and services as well as train our team.

- We may also capture information about other people you may discuss with us as part of customer service or correspondence, chats with users, and other content.

Information from other people

We also receive information about you from others which includes:

- **Swoovy Users**

  Other users may provide information about you when they use our application and other services. We may collect information about you from other users if the contact us about you. It can also happen when a user has us access her/his phonebook contacts and you are one of them. We may use it to reach out to you.

- **Swoovy Partners**

  We may receive information about you from our partners, including nonprofits we team with to provide volunteering services or other organizations seeking volunteers (each, an "Agency"). For example, you will in some instances be able to create a Swoovy account from an Agency's website (in which case they pass along registration information to us). In addition, in some instances Swoovy ads are published on an Agency's website and platform (in which case they may pass along details to us).

You may have accessed Swoovy by visiting our website or through the site of one of our Agencies or affiliate partners. This notice applies to all information you submit to Swoovy through either of these types of sites. Please note that we cannot be responsible for the information you submit directly to third parties, including our Agencies or affiliate partners, who may have their own posted policies regarding the collection, use, and disclosure of your information. We urge you to review the policies of our Agencies or affiliate partners through whom you may access our services.

We will forward your information to Agencies when you indicate to Swoovy you are interested in a specific volunteer opportunity and you provide us with your information. This helps the Agency to contact you or connect you with a local affiliate. Each Agency has specific policies regarding collection and use of personal information. We are not responsible for their use of your information. Please contact the Agency directly using the contact information posted for that Agency on their website.

When you provide information to us through our services regarding volunteer opportunities associated with one of our Agencies, or have accessed the services through an Agency, we may share your information and connection history with the applicable Agency. Our Agencies each have their own policies regarding the collection and use of personal information, and Swoovy is not responsible for their use of your information. Furthermore, our Agencies may collect additional information from you, independent of Swoovy, in connection with the volunteer services.

Information we collect

When using our services, we collect details about which features you've used, the ways you've used them, and devices used to access them. Details include:

- **Usage Information**

  We collect information when you use our services (e.g., date and time logged in, features accessed, searches, clicks and pages which have been shown to you, referring webpages, ads you click on) and interactions with other users (e.g., specific users, time and date, number of messages exchanged).

- **Device Information**

  We collect information from and about the device(s) and software you use to access our services, including:

  - IP address, device ID and type, device-specific and apps settings and attributes, app crashes, ad IDs (including Google's AAID and Apple's IDFA, both of which are randomly generated numbers that you can reset by going into your device' settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address);
  - Wireless and mobile network connection, including service provider and signal strength; and
  - Device sensor data including compasses, gyroscopes and accelerometers.

- **Additional Information Based on Your Approval**

  By providing us with permission, we can collect your precise geolocation (latitude and longitude, depending on the device and service and you're using, including Wi-Fi connections, Bluetooth and GPS). Your geolocation information may be collected in the background even when you aren't using the services

if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will not collect it.

We may collect (with your permission) your photos and videos (to publish a photo, etc.).

4. COOKIES AND SIMILAR DATA COLLECTION TYPES

Use of Cookies

We use may use cookies in our service to personalize your experience. A cookie is a small text file that is placed on your device by a webpage server. Cookies cannot be used to run programs or deliver viruses to your device. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. One of the primary benefits of cookies is to save you time and effort. A cookie can utilize your page visits, navigation, etc., to help the site to recall your specific information on subsequent visits. This informs the delivery of relevant content, improves site navigation, etc. When you return to the website, the information you previously provided can be retrieved, enabling the features you personalized. Swoovy may occasionally share aggregated site statistics with partner companies, but we do not allow other companies to place cookies on our website. You can accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you want. By choosing to decline cookies, you may not be able to fully experience the features of this or other websites.

Webpages on our website may contain electronic images known as web beacons - sometimes also called single-pixel gifs - that allow our website to count users who have visited those pages and to deliver co-branded services. Our website may include web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon. Some of these web beacons may be placed by third-party service providers to help determine the effectiveness of our advertising campaigns or email communications. These web beacons may be used by these service providers to place a persistent cookie on your device. Doing this allows the service provider to recognize your device each time you visit certain pages or emails and compile anonymous information in relation to those page views. Our website precludes web beacons from being used to collect or access your personal information.

Certain web browsers (including Safari, Internet Explorer, Firefox and Chrome) have a "Do Not Track" ("**DNT**") feature that tells a website that a user does not want to have his or her online activity tracked. If a website that responds to a DNT signal receives a DNT signal, the browser can block that website from collecting certain information about the browser's user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many businesses, including Swoovy, do not currently respond to DNT signals.

5. HOW SWOOVY USES YOUR INFORMATION

We primarily use your information to deliver and improve our services. We may also use your information for safety purposes for you as well as customized ads. Here are more details.

Account administration and services

- ○ Create and manage your account
- ○ Provide customer support
- ○ Complete your transactions
- ○ Communicate about our services, including order management and billing

Help connect you with other users

- ○ Analyze your profile and those of others to recommend meaningful connections

- ○ Enable you to register for philanthropic activities

- ○ Show users' profiles to one another

Ensure a consistent experience across your devices

- ○ Link the various devices you use so that you can enjoy a consistent Swoovy experience on all of them. We do this by linking device and browser data including things like IP address, browser details and other data.

Serve you relevant ads and other offers

- ○ Discounts, contests, events and other offers

- ○ Develop, display and track content and advertising tailored to your interests on our services and other sites

- ○ Communicate with you by email, mobile device, social media or phone about products or services that we think may interest you

Improve Swoovy services and create new ones

- ○ Administer surveys, focus groups and other activities

- ○ Research and analyze user behavior to improve our services and content

- ○ Develop new features and services

To prevent, detect and fight other illegal or unauthorized activities including fraud

- ○ Address ongoing or alleged misbehavior on and off-platform

- ○ Perform data analysis to better understand and design countermeasures against these activities

- ○ Retain data related to fraudulent activities to prevent against recurrences

To ensure legal compliance

- ○ Comply with legal requirements

- ○ Assist law enforcement

- ○ Enforce or exercise our rights, for example our [Terms of Use](#)

To process your information as described above, we rely on the following:

- ○ *Provide services to you*: We typically process your information to honor our agreement(s) with you.

- ○ *Improving our services*: We may use your information where we have legal and legitimate interests to so to improve our features, add new ones, detect and prevent fraud, etc.

- ○ *Consent*: Swoovy may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Policy.

6. SHARING YOUR INFORMATION

Our goal is to help you make meaningful connections between our users which requires sharing user information with other users. We also share some users' information with service providers and partners who assist us in operating the services, and, in some cases, legal authorities. Additional details include:

- **Sharing with other users**

  Given that you are sharing some personal information in a public forum, we recommend that you keep in mind your information being viewable by others. We cannot control what other people do with your information once you share it publicly.

- ***Sharing with our service providers and partners***

  We use third parties to help us operate and improve our services. These third parties may assist us in a variety of areas including analytics, product development, payment processing, security, data hosting, legal, etc.

  We also may share information with organizations that assist us in with advertising and social media activities. This may include sharing very limited information on you in hashed, non-human readable form to our partners.

  We follow a strict vetting process prior to engaging any service provider or working with any partner. All of our service providers and partners must agree to strict confidentiality obligations.

- ***Corporate transactions***

  We may transfer your information in conjunction with potential activities including a sale, merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

- ***Required by law***

  We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

- ***Enforce legal rights***

  We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

- ***By your consent or request***

  We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

We may use and share non-personal information (meaning information that, by itself, does not identify who you are such as device information, general demographics, general behavioral data, geolocation in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above circumstances. We may also share this information with third parties (notably advertisers) to develop and deliver targeted advertising on our services and on websites or applications of third parties, and to analyze and report on advertising you see. We may

combine this information with additional non-personal information or personal information in hashed, non-human readable form collected from other sources. More information on our use of cookies and similar technologies can be found in Section 4 above entitled "Cookies and Similar Data Collection Types."

7. YOUR RIGHTS

We want you to be in control of your information and provide you with tools, including:

- ○ <u>User settings</u>. Features available for you to access, change, or delete information that you provided to us associated with your account directly within the service. Please feel free contact our customer care team for assistance via email at: customerservice@swoovy.com

- ○ <u>Device permissions</u>. Mobile platforms have permission systems for specific types of device data and notifications, such as phone book and location services as well as push notifications. You can change your settings on your device to either approve or deny the collection of the related information or display of the related notifications. These decisions will affect the functionality you can access.

- ○ <u>Deletion</u>. You can delete your account by using the corresponding functionality directly on the service.

We want you to be aware of your privacy rights. Here are a few key points to remember:

- ○ <u>Reviewing your information</u>. Applicable privacy laws may give you the right to review the personal information we keep about you (depending on the jurisdiction, this may be called right of access, right of portability or variations of those terms). You can request a copy of your personal information by sending us an email at: customerservice@swoovy.com

- ○ <u>Updating your information</u>. If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion or object to its processing, please contact us via email at: customerservice@swoovy.com

For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. If you wish to receive information relating to another user, such as a copy of any messages you received from him or her through our service, the other user will have to contact Swoovy's Privacy Officer to provide their written consent before the information is released.

- ○ <u>Uninstall</u>. You can stop all information collection by an app by uninstalling it using the standard uninstall process for your device. If you uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.

8. RESIDENTS OF CALIFORNIA

- ○ If you are a California resident, you can request a notice disclosing the categories of personal information about you that we have shared with third parties for their direct marketing purposes during the preceding calendar year. To request this notice, please submit your request via email to: customerservice@swoovy.com

Please allow 30 days for a response. For your protection and the protection of all of our users, we may ask you to provide proof of identity and California residency before we can answer such a request.

9. PROTECTING YOUR INFORMATION

Our goal is to protect you from unauthorized access to or any disclosures, alterations or destruction of your personal data. We will continue to take steps to secure your data but cannot promise, nor should you expect, that your personal information will always stay secure.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify Swoovy immediately via email to: customerservice@swoovy.com.

10. RETAINING YOUR INFORMATION

We keep your personal information only as long as we need it for legitimate business reasons and as protected by law.

We will delete or anonymize your information upon deletion of your account, unless:

1. we must keep it to comply with applicable law;
2. we must keep it to evidence our compliance with applicable law;
3. there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
4. the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behavior or security incidents from opening a new account.

Swoovy cannot promise that all data will be deleted within a specific timeframe if due to technical constraints.

11. SWOOVY IS FOR ADULTS ONLY

Swoovy does not permit users under the age of 18 on our platform and we do not knowingly collect personal information from anyone under the age of 18. Please inform Swoovy if you suspect a user is under the age of 18.

12. PRIVACY POLICY UPDATES

Swoovy's Policy may change. We will notify you before any material changes take effect so that you have time to review the changes.

13. THIRD-PARTY LINKS

Our service contains links to other third-party sites. Swoovy is not responsible for the privacy practices or the content of such third-party sites.

14. HOW TO CONTACT US

If you have questions about this Privacy Policy, please email us at: customerservice@swoovy.com