

Privacy Statement

Effective Date of MyNotes4u Privacy Statement: January 2, 2020

At MyNotes4u your privacy is a top priority. MyNotes4u is committed to being a good steward of your Personal and User Provided Information, handling it in a responsible manner, and securing it with administrative, technical, and physical safeguards.

We also believe in being honest, direct and transparent when it comes to your data. MyNotes4u follows three guiding principles when it comes to your privacy:

- **Transparency** - We work hard to be transparent about what Personal and User Provided Information we collect, process and maintain on your behalf.
- **Simplicity** - We try to use easy-to-understand language to describe our privacy practices.
- **Control** - We give you control over the Personal and User Provided Information you provide to us, how it is used, shared, and retained.

1. Introduction

MyNotes4u is a private community dedicated to fostering positive relationships between family and friends through appropriate contextual comments, stories, photos, videos, and links. Individual items added to the site can be shared and preserved as a person's legacy for future generations to discover and enjoy.

As a result, at MyNotes4u we collect, process and store your Personal Information as you use our websites, mobile application, and services (collectively the "Services"). Personal Information is information that can identify you, such as your name, email or street address, or it may be information that could reasonably be linked back to you. This Privacy Statement describes our practices for collecting, storing and processing your Personal Information and the controls we provide you to manage it within our Services.

2. Account Creation and Your Engagement with MyNotes4u Services

The Personal Information required to create an account with MyNotes4u is limited to your name, an email address, and a password. For subscription purposes, billing information is also required for account creation.

Account creation also requires you to agree to the MyNotes4u Terms and Conditions, Community Rules and this Privacy Statement.

By creating an account, you are telling us that you understand MyNotes4u will collect, process, and only share your Personal Information as described in this Privacy Statement and in any other documents referenced in this Privacy Statement.

At any time, you can request MyNotes4u delete information you have uploaded into your account. You can also delete your entire account.

3. What Information Does MyNotes4u Collect From You?

The table below describes in more detail the information we collect from you. In this Privacy Statement, we refer to data that relates to you as “Personal Information.”

Information category	Description
Account Information	Your Name Email address A password that you provide us when you create an account
Credit Card/Payment Information	Payment information, such as your credit card number, and your billing address when you purchase a MyNotes4u subscription. MyNotes4u uses PayPal services for processing subscriptions. Payment information is not stored by MyNotes4u.
Profile Information	<ul style="list-style-type: none">▪ We collect the information that you provide when you voluntarily create a user profile. This information may be seen by other Users.▪ Additional personal details that you provide in your profile (for example, images, your name, family connections, etc.), will be visible to other Users.
User Provided Content	<ul style="list-style-type: none">▪ Information you provide about yourself when you voluntarily contribute to the Services, upload content or participate in community discussions, which may include information about yourself or other living persons. For example, you might contribute details (personal information, stories, images, videos, etc.) about you or other users' such as family or friends. This content is contained in My Album, My Family Album, My Friends Album, Groups and Member sections. This information is visible to other users.▪ MyNotes4u does not solicit family or friends medical, criminal or DNA information. Users who choose to post this type of information anywhere in the MyNotes4u website or mobile application, do so at their own risk and are solely responsible.▪ Information about deceased persons is not Personal Information under this Privacy Statement.

Information category	Description
Additional User Information	Information that you provide to us when you answer questions offered through the Services, surveys or questionnaires.
Note about health-related information	MyNotes4u is not a covered entity under the Health Insurance Portability and Accountability Act (“ HIPAA ”), and as a result no Additional User Information provided by you is subject to or protected by HIPAA.
Your Communications	Your communications with other Users through our communications features, as well as information you provide in communications with MyNotes4u Member Services and support teams for our other Services, including audio and visual information (such as recordings of calls with MyNotes4u Member Services or information voluntarily shared when doing consumer insights research).
Contests and Promotions	Personal Information when you voluntarily participate in contests and special promotions we run or sponsor.
Other Protected Classifications and Sensitive Data	We may collect information related to certain protected classifications such as gender or marital status.

4. What Information Does MyNotes4u Collect Through Your Use of the Services?

Information category	Description
Computer and Mobile Device Information	<p>Information about how you access our Services, including the website you visited before and after MyNotes4u’s site.</p> <p>The Internet protocol (“IP”) address of your computer, mobile device, or the proxy server that you use to access the Internet, in addition to other technical information, such as:</p> <ul style="list-style-type: none">▪ Your computer operating system.▪ Your web browser.▪ Your mobile device identifier provided by your mobile device operating system and your mobile operating system.
Information from Cookies and similar technologies	Cookies and similar technologies as described in our Cookie Policy. Please refer to our Cookie Policy section of our Terms and Conditions document to learn about our practices and the controls we provide you.

5. How does MyNotes4u use your Personal Information?

Information category	Use Description
Personal Information (generally)	<p>We use your Personal Information to provide, personalize, improve, update and expand our Services. This includes:</p> <ul style="list-style-type: none">▪ Authenticating your access to the Services and improving MyNotes4u information security;▪ Processing your payments for subscriptions;▪ Building new and improving existing Services;▪ Helping you create, and providing insights about, your family and friends;▪ Issuing surveys and questionnaires to collect Additional User Information for use in the Services, as well as facilitating product development and research initiatives;▪ Conducting scientific, statistical, and historical research; and▪ Detecting and protecting against error, fraud, or other criminal or malicious activity and enforcing our Terms and Conditions.
Communications	<p>We use your Personal Information to communicate with you about the Services, such as when we:</p> <ul style="list-style-type: none">▪ Respond to your inquiries to Member Services;▪ Inform you of changes to Services or new Services;▪ Ask you to participate in MyNotes4u media productions or testimonials; and,▪ Provide you with information or request action in response to technical, security, and other operational issues.
Market new products and offers from us.	<p>We may contact you directly in order to use your personal or user provided information to market new products and offers from us. We do not share your personal or user provided information with third-party marketers, insurance companies or employers, and we will not use your personal or user provided information for marketing or personalized advertising without getting your explicit consent.</p>

6. What Information Do We Share, when Do We Share It and Who are the Recipients?

MyNotes4u does not share your individual personal or user provided information with third parties, such as: insurance companies, employers, or third-party marketers without your express consent. In the interest of safety for all our users, MyNotes4u will share your information with law enforcement only when it is requested through a valid legal process.

NOTE: MyNotes4u does not sell your Personal Information.

MyNotes4u may share the following categories of Personal Information about you or your use of the Services with the types of entities set forth in this section for business purposes (as defined by applicable law), or as required by applicable law:

Identifiers (such as name, address, email address); Account Information (such as billing address); Credit Card/Payment Information; Computer or Mobile Device Information; Audio and Visual information (such as recordings of calls with MyNotes4u Member Services or information voluntarily shared when doing consumer insights research); Inference data about you; Other Protected Classifications (such as gender and marital status); Health Information as well as Biological, Physiological, or Behavioral Traits and anything else mentioned in the table below.

The circumstances described below explain when sharing might occur:

People with whom your Information may be shared / Circumstances in which sharing might occur	Description
Other Users or others you may choose to share with	<p>As part of your use of the Services, you have the option to add or share information with all Users of the Service or through sharing features with individual Users.</p> <p>If you share details of your family and friend history experience outside the Services, you do so at your own risk.</p>
Service Providers	<p>We work with other companies when providing and marketing the Services. As a result, these companies will have some of your information in their systems. These companies are subject to contractual obligations governing data security and confidentiality consistent with applicable laws.</p> <p>These companies include our:</p> <ul style="list-style-type: none"> ▪ Payment processors; ▪ Cloud services infrastructure providers; ▪ Vendors that assist us in marketing, (including advertising), consumer research analytics, fraud prevention, and security; ▪ Communications infrastructure providers; and,

People with whom your Information may be shared / Circumstances in which sharing might occur	Description
	<ul style="list-style-type: none"> Some Member Services functions.
Law Enforcement	<p>To provide our Users with the greatest protection under the law, we require all government agencies seeking access to MyNotes4u customers' data to follow valid legal process.</p> <p>If we are compelled to disclose your Personal Information to law enforcement, we will do our best to provide you with advance notice, unless we are prohibited under the law from doing so.</p>
Other Legal or Regulatory Process	<p>We may share your Personal Information if we believe it is reasonably necessary to:</p> <ul style="list-style-type: none"> Comply with valid legal process (e.g., subpoenas, warrants); Enforce or apply the MyNotes4u Terms and Conditions; Protect the security or integrity of the Services; or Protect the rights, property, or safety, of MyNotes4u, our employees or users.
If MyNotes4u is Acquired	<p>If MyNotes4u is acquired or transferred (including in connection with bankruptcy or similar proceedings), we will share your Personal Information with the acquiring or receiving entity. The promises in this Privacy Statement will continue to apply to your Personal Information that is transferred to the new entity.</p>

7. Your Choices and Access to Your Personal Information

Subject to certain exceptions, you have a right to request access to your Personal Information and to be provided with a copy of certain information including the categories of your personal information we collect and disclose; the categories of sources of such information; and the business purpose for collection in a portable form, as well as to seek to update, delete or correct this information by using the tools described below or by contacting [MyNotes4u](#). Details and options for accessing this information are listed below.

Type	Choices
MyNotes4u	You can access and update the Personal Information (such as your email address, username, profile information, etc.) that you provide to MyNotes4u at any time in the profile section of your user account.

8. What are our retention practices?

MyNotes4u Services are fundamentally premised on the notion that members are building and preserving memories throughout their lifetime, and as a legacy for future generations. Additionally, and with regard to our subscribers, our services provide benefits and insights to our Users over time. As a result, our retention practices reflect this ongoing value by retaining user accounts on our system until our Users inform us of their desire to delete their data or close their accounts.

Information Category	Retention Period
Account and Profile	MyNotes4u will retain the Personal Information you provide while creating your account and your profile until such time as you ask us to delete it.
User Provider Content	MyNotes4u will retain the User Provided Content you provide while using your account and your profile until such time as you ask us to delete it. At the time of death, a family member may request MyNotes4u to archive the account for future generations access.
Usage Information	In some cases, we choose to retain usage information (e.g., visits to sites) in a depersonalized or aggregated form. Once aggregated, this information ceases to be personal and will not be subject to user deletion requests.

9. How can I delete my Personal Information?

You can delete your Personal Information from MyNotes4u in two ways.

Information Category	How to delete
Personal Information	You can delete your Personal Information from MyNotes4u by logging into your account profile or by contacting us support@mynotes4u.com .

Information Category	How to delete
	<p>To the extent you have shared information through the Services, MyNotes4u will not be able to remove any copies of information that other Users may have retained.</p> <p>If you have shared content with others either directly or made personal details available to other Users, some of your Personal Information may have been copied to other Users' system, which can only be removed by contacting the other User and asking them to delete it.</p>
General	<p>Please note that there may be some latency in deleting your Personal Information from our backup systems after it has been deleted from our production, development, payment, analytics, and research systems.</p>

10. Security

MyNotes4u content is maintained at an industry leading secure service provider location. Our providers security team regularly reviews their security and privacy practices and enhances them as necessary to help ensure the integrity of our systems and your Personal Information. For information regarding our service provider [Privacy Policy](#).

MyNotes4u's industry leading service provider maintains a comprehensive information security program designed to protect our customers' Personal Information using administrative, physical, and technical safeguards.

The specific security measures used are based on the sensitivity of the Personal Information collected. We have measures in place to protect against inappropriate access, loss, misuse, or alteration of Personal Information under our control.

We use secure server software to encrypt Personal Information, and we only partner with security companies that meet and commit to our security standards. While we cannot guarantee that loss, misuse or alteration of data will not occur, we use reasonable efforts to prevent this.

It is also important for you to guard against unauthorized access to your Personal Information by maintaining strong passwords and protecting against the unauthorized use of your own computer or device.

11. Changes to this Statement

We may modify this Privacy Statement at any time, but we will provide prominent advance notice of any material changes to this Statement, such as posting a notice through the Services, on our websites, or sending you an email, to provide you the opportunity to review the changes and choose whether to continue using the Services.

We will also notify you of non-material changes to this Statement as of their effective date by posting a notice through the Services, on our websites, or sending you an email. Your continued use of our Services after notice of non-material changes means that you consent to the updated Privacy Statement.

If you object to any changes, you may delete your account as described in Section 9.

12. California's Shine the Light Law

California Civil Code Section 1798.83, known as the "Shine the Light" law, permits Users who are California residents to request and obtain from us a list of what Personal Information (if any) we disclosed to third parties for their direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. Under Section 1798.83, MyNotes4u currently does not share any Personal Information with third parties for their own direct marketing purposes.

13. Legal basis under EU General Data Protection Regulation for processing personal information of EU residents.

Where you have consented to data processing, your consent provides the legal basis to process your Personal Information. We rely on your explicit consent to process your information. You have the right to withdraw consent at any time. Please note that your withdrawal of consent to collect and process your Personal Information will not affect the lawfulness of processing your Personal Information based on your consent before you withdrew your consent.

We may also process your Personal Information on the basis of contractual necessity to perform a contract we have with you. For example, we process your credit card details when you provide them in order to use our Services.

We may also process your Personal Information on the basis of our legitimate interests, including in providing and improving the Services. For example, MyNotes4u has a legitimate interest in understanding your login history so we can assess your interaction with our Services. We also have a legitimate interest in providing and developing interesting features to provide to our Users. We use your Personal Information to keep our Services safe and secure and we do so as it necessary to pursue your and our legitimate interests in ensuring that our Services are secure, and to protect against fraud, spam and abuse.

Where we rely on legitimate interests to process your Personal Information, you have the right to object to such processing (meaning that you can ask us to stop).