



PRIVACY POLICY

INTRODUCTION

SOCH Enterprise Inc. ("us", "we", or "our") operates the SOCH mobile application (hereinafter referred to as the "Service"). This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions. By using our Service you understand and accept this privacy policy along with any changes as may be made from time to time and thereby expressly consent to our collection, use and disclosure of Personal Information (as defined below) in accordance with this Privacy Policy. If you are not agreeable to this, please do not proceed further to use the Application and the services.

DEFINITIONS

i. **Service**

Service is the SOCH mobile application operated by SOCH Enterprise Inc.

ii. **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

iii. **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

iv. **Cookies**

Cookies are small files stored on your device (computer or mobile device).

v. **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

vi. **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

vii. **Data Subject (or User)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

INFORMATION COLLECTION AND USE

We collect several different types of information for various purposes to provide and improve our Service to you.

TYPES OF DATA COLLECTED

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Cookies and Usage Data

Usage Data

When you access the Service with a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data ("Usage Data").

Location Data

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

USE OF DATA

SOCH Enterprise Inc. uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

We may use certain third-party analytics tools to help us measure traffic and usage trends for the Services. These tools collect information, which is not personal or sensitive in nature sent by your device or our Services, including the web pages you visit, add-ons, and other information that assists us in improving the Services. We collect and use this analytics information with analytics information from other Users in the form of anonymised logs, so that it cannot reasonably be used to identify any particular individual User. Please note that neither SOCH, nor its Affiliates or any third parties engaged by SOCH shall use the Personal Information to personally identify any User.

RETENTION OF DATA

SOCH Enterprise Inc. will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

SOCH Enterprise Inc. will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

SOCH Enterprise Inc. will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

LEGAL REQUIREMENTS

SOCH Enterprise Inc. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of SOCH Enterprise Inc.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

SECURITY OF DATA

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used. These third parties have access to your Personal

Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

SHARING OF CONTENT

1. We may share Personal Information (including but not limited to, information from cookies, log files, device identifiers, location data, and usage data) with businesses that are legally part of the same group of companies that SOCH is part of, or that become part of that group (“**Affiliates**”). Our Affiliates may only use this information to help provide, understand, and improve the Service (including by providing analytics) and Affiliates’ own services (including by providing you with better and more relevant experiences).
2. We also may share your Personal Information as well as information from tools like cookies, log files, and device identifiers and location data, with third-party organizations that help us provide the Services to you. Our service providers will only be given access to your information as is reasonably necessary to provide the Services. All the Service Providers and third parties engaged by SOCH shall be bound by adequate confidentiality terms to protect the Confidential Information and the Personal Information of the User so that such information is not used in any manner it is not intended to be used.
3. While sharing any information with any third party, we will remove parts of data that can identify you and share only anonymized data with other parties. We may also combine your information with other information in a way that it is no longer associated with you and share that anonymised aggregated information which cannot be traced back to you.
4. Please note that only Personal Information or content that you **voluntarily disclose** for posting to the Website, or post to any social media account owned and operated by SOCH becomes available to the public. No other information provided by you is shared with the public. Once you have shared such information or made it public, the same may be re-shared by others, re-posted by SOCH, or used by SOCH for the purposes of analysis, research or studies.
5. SOCH shall not ordinarily share the sensitive Personal Information of a User without their prior consent. You agree that SOCH may share sensitive Personal Information of a User with any third party without obtaining the prior consent of the User in the following limited circumstances:
 1. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing the Terms of Use, this Privacy Policy, or for complying with the applicable laws and regulations.
 2. SOCH proposes to share such information within its group companies and officers and employees of such group companies for the purpose of processing personal information on its behalf. SOCH also ensures that the recipients of such information agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

STORAGE OF INFORMATION AND CONTENT

Please make sure that you maintain the secrecy of your account information. For the safety and security of your information, we have implemented procedures to help protect the information that you provide to us. However, no method of transmitting or storing electronic data is ever completely secure, and we cannot guarantee that such information will never be accessed, used, or released in a manner that is inconsistent with this policy. We expressly disclaim any representation or warranty, whether express or implied, with respect to ensuring, guaranteeing, or otherwise offering any definitive promise of security in connection with your Information. **THE USER IS RESPONSIBLE FOR MAINTAINING THE SECRECY OF YOUR ACCOUNT INFORMATION AT ALL TIMES.**

PAYMENTS

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

PayPal / Braintree

Their Privacy Policy can be viewed at

<https://www.paypal.com/webapps/mpp/ua/privacy-full>

LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal

Data from children without verification of parental consent, we take steps to remove that information from our servers.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

CONTACT US

If you have any questions about this Privacy Policy, please contact us:

- By email: contact@soch.app

Effective date: May 07, 2019