

Privacy Policy

Snap & Track (or “we”) values your privacy in your personal information and your Content that you store in our Service. This Privacy Policy (“Privacy Policy”) explains what information Snap & Track collects about you, how we collect and use that information and how we handle the content you provide in order to give to you greater tools to understand, control, access, and delete the collection, use and sharing of your Personal Information. This Privacy Policy is incorporated into and made a part of the Snap & Track Terms of Service. Capitalized terms used, but not otherwise defined in this Privacy Policy shall have the meanings provided for those terms in the Terms of Service.

We reserve the right, at any time, and from time to time, to modify, update or revise this Privacy Policy. We will post those revisions to this Privacy Policy to our website and you will have the opportunity to consent to those modifications. You should review this Privacy Policy periodically so that you keep up to date on the most current versions and related practices and procedures. By using the Service and Website, and/or Application, you accept the terms of and consent to this Privacy Policy. This consent provides us with the legal basis to process your personal information. You have the right to withdraw your consent at any time.

TYPES OF INFORMATION WE COLLECT

Throughout your use of our Service, we collect Personal Information about you. The term “Personal Information” means any information about you that makes you identifiable, which includes, but is not limited to the following:

When you open your Account, we collect the following Personal Information.

- Your account login information,
- Your email address,
- Your passwords and
- other (online) identifiers.

The following Personal Information, we do not collect when you open an Account, but we may collect as you use the Service.

- Your name
- Your birthdate.
- Your telephone numbers.
- Your address and zip code.
- Data identifying your location.
- Your gender
- Your biometric data (including photos).

A subset of Personal Information includes information specially designated as “Sensitive Personal Information” which includes:

- Your credit card information

Other information, that does not constitute Personal Information, but may, in the course of your use of our Service, be collected, includes:

- Behavioral or demographic attributes.
- Transactional data based on past purchase behavior.
- Data from marketing opt-in lists, consumer surveys or publicly available information.
- Unique Id’s, such as cookies placed on a computer or device.

- Internet Protocol address (“IP Address”) and information derived from IP addresses.
- Information derived from the mobile device being used, such as GPS, and location services,
- Behavioral data regarding your device or website usage, such as advertisements clicked, websites and content areas accessed, search histories and activities logs.

WHO WILL COLLECT AND PROCESS PERSONAL INFORMATION

Decisions regarding collection of Personal Information are made by the “Data Controller”. A “Data Controller” is the person or organization who decides the purposes for which and the way in which Personal Information is collected and processed. A “Data Processor” is a person or organization that processes personal data (including Personal Information) for the Data Controller. Data Processing includes collection, recording, organizing, structuring, storing, adapting, altering, retrieving, using, disclosing, transmitting, disseminating, combining, restricting, erasing or destroying data.

HOW WE COLLECT PERSONAL INFORMATION

We collect information from you in the following ways:

- *Usage Information.* Some Personal Information is collected when you provide it to us. For example, when you create an Account, you may provide your name, password, email address, phone number and birthdate. You also provide information when you log in to your account or when you fill in forms, respond to surveys or provide feedback. We may also ask you to provide us with some additional information that will be publicly visible on our services, such as profile pictures, avatars, a name, or other useful identifying information. You may also provide us with credit or debit card and its associated account information.
- Our Website uses “Cookies” which are text files on your computer that help identify you and collect internet log information and visitor behavior. Cookies allow us, among other things, to measure activity and personalize your experience, and may also allow us to remember your viewing preferences and create statistical reports on website activity. You may choose to set your browser to reject cookies or manually delete individual or all the cookies on your computer. We also provide you the option to accept or reject Cookies when you visit our website. However, if you reject or delete cookies, it may impact your ability to use certain features of our Website. Please see our Cookies Policy. You may learn more about cookies at www.allaboutcookies.org.
- *Web Server Logs.* Web server logs are activity records created when you visit web pages, such as search terms you enter, device information and identifiers, information about your browser, IP address, cookies on your browser, access times, and pages viewed.
- *Web Beacons.* Web Beacons are electronic files that allow us to recognize and count users who have visited the Website and can be used in HTML-formatted emails to determine responses and response rates to our communications (for example, by clicking a link in an email).
- *Third-Party Data Sources.* We may also receive marketing information from third parties that include information collected from online and offline sources. This could include advertisements or application update notices. We may collect information that other users provide about you when they use our services. For example, if another user allows us to collect information from their device phonebook—and you’re one of that user’s contacts—that may be combined with other information we have collected about you.
- *Device Information and Location Information.* We collect information from and about the devices you use, such as your location, your hardware and software, operating system, device memory, advertising identifiers, unique application identifiers, apps installed, browser type, language, time zone; information from device sensors (such as accelerometers, gyroscopes, compasses, microphones, and wireless and mobile network

information, such as mobile phone number, service provider, and signal strength). We may ask for permission to collect images and other information from your device's camera and photos.

- *Social Networking Sites.* If you log into your account using shared sign-in services, such as Facebook or Google, you authorize us to access certain information about you from that social networking site, such as your user profile, friend list and profile picture.

HOW WE USE PERSONAL INFORMATION WE COLLECT

We take your privacy seriously and only use your Personal Information to provide our Services to you, subject to applicable data protection laws.

- *Lawful Reason for Collecting Information.* The lawful reasons for collecting and processing your information are: (1) because you have entered into a contract for us to supply goods and services to you; (2) we have a legitimate interest in using your information (for example, to provide and improve our services, customer support and show you advertisements we think you'll find interesting,) but we only rely on this legitimate interest reason when we think our use of your information doesn't significantly impact your privacy or there is a compelling reason to do so; and (3) to comply with applicable law.
- *Uses of Information.* You agree that we are entitled to obtain, use, and process the Personal Information and other information you provide to us to enable us to discharge the Services and for other related purposes, including:
 - To create your account, provide you with convenient and personalized access to your account, and deliver and support the Service (including through our website and Application).
 - Updating and enhancing our records
 - Analysis for management purposes
 - Carrying out credit checks, background checks and crime and fraud prevention
 - Legal and regulatory compliance
 - Develop, operate, improve, and enhance the safety or performance of our products and services.
 - Send you communications, including by email, such as product announcements and marketing materials for special offers, and software updates
 - Respond to your requests for assistance.
 - Personalize our Services.
 - Provide and improve ad targeting and measurement.
 - Enforce our Terms of Service, legal and contractual obligations, and other policies.
 - We may analyze your Personal Information to create a profile of your interests and preferences so that we can contact you with products and service information that we think may be of interest to you, to complete or process transactions and to send you confirmations and receipts, to inform you of updates, monitor usage and performance of the Website and Application, and enhance the Website and Application for better user experiences.
- *User Content.* The Service allows you to supply or post "User Content," which means communications, videos, images, sounds and all the material, data and information that you upload or transmit through the Service, or that Other Users upload or transmit, including comments you may make about their content. The User Content you create remains yours; however, by sharing User Content through the Service, you agree to allow others to view, edit, copy and/or share your User Content. We have the right (but not the obligation) in our sole discretion to remove any User Content. Once your Account is terminated or your rights to use the Service are terminated, you will not be given any rights to view or access any User Content and there may be no way to delete or retrieve User Content once it has been shared.

HOW WE SHARE INFORMATION

- *With Other Users.* We may share your username, name, Bitmoji, avatars, and profile picture and your User Content as well as any additional information you have authorized us to share with other users of our Service. How widely your User Content is shared depends on your settings and the way you designate your User Content. For example, you can control the scope of distribution of your User Content by designating it as “public” or “private”.
- *With Our Affiliates.* We may share information with other entities within the Snap & Track family of companies.
- *With Third Parties.* We may share your information with the following third parties:
 - *With service providers.* We may share information about you with our employees, contractors and third-party service providers who have a need to access this information to assist us in providing the Service or who perform services on our behalf.
 - *With business partners.* We may share information about you with business partners that provide services and functionality and these third-parties only use your personal information as we direct them. Our Services may also contain third-party links and search results, include third-party integrations, or offer a co-branded or third-party-branded services. Through these links, third-party integrations, and co-branded or third-party-branded services, you may be providing information (including personal information) directly to the third party, us, or both.
 - *With third parties as part of a merger or acquisition.* If we become involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of our business to another company, we may share your information with that company before and after the transaction closes.
 - *With third parties for marketing.* We may share information about you with third party providers for purposes of cross-marketing or making offers to you of their products or services. We also may use your information to send to you email marketing, direct mail marketing and other marketing of our products and services (and those of our partners), including but not limited to targeted advertising. We may let other companies use cookies, web beacons, and similar technologies on our services to collect information about how you use our Services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity. Additionally, some companies, including our affiliates, may use information collected on our services to measure the performance of ads and deliver more relevant ads on behalf of us or other companies. You have the right any time to stop us from contacting you for marketing purposes.
 - *With Third Parties for Legal Reasons.* We may share information about you if we reasonably believe that disclosing the information is needed to (a) comply with any valid legal process, governmental request, or applicable law, rule, or regulation; (b) investigate, remedy, or enforce potential Terms of Service violations; (c) protect the rights, property, and safety of us, our users, or others; (d) detect and resolve any fraud or security concerns; or (e) respond to claims by third parties that your User Content violates their rights. We reserve the right to cooperate fully with any law enforcement authorities or court order requesting or directing us to disclose the identity or other information of anyone. We reserve the right to take any and all appropriate legal action, including referral to law enforcement agencies. You waive and hold harmless Snap & Track and its affiliates, licensees, licensors and service providers from any claims resulting from any action taken by any of them during,

or because of investigations or legal process by Snap & Track, its affiliates or law enforcement agencies.

You acknowledge and agree that when your information is shared with third parties, we are not responsible for how those third parties collect or use your information. We encourage you to review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our services.

HOW WE PROTECT YOUR INFORMATION

We use a combination of technical tools and security procedures to safeguard your information from unauthorized access. Our computer systems utilize industry standard security measures designed to prevent unauthorized access. We also have internal policies in place designed to minimize the risk of unauthorized access to your information. While we follow reasonable procedures within our possession, no security system is perfect, and we cannot promise, and you shall not expect, that your Personal Information will remain secure in all circumstances. Sensitive Personal Information (such as credit card or debit card details) is encrypted and protected with 128 Bit encryption on SSL. Non-sensitive Personal Information are sent normally over the Internet, and this can never be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk. You are responsible for keeping your passwords confidential and not sharing them with anyone.

HOW LONG WE KEEP YOUR INFORMATION

We store your Personal Information until you ask us to delete it or you terminate your Account with us. We store other information for various lengths of time based on how precise it is and which services you use. If you decide to stop using Snap & Track, you can ask us to delete your Account and the Personal Information collected as part of your Account (Please see "Deletion of Account Information" below).

YOUR CALIFORNIA PRIVACY RIGHTS

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or "CCPA." For more details about the personal information we have collected over the last 12 months, including the categories of sources, please see the "TYPES OF INFORMATION WE COLLECT" section above. We collect this information for the business and commercial purposes described in the "HOW WE USE PERSONAL INFORMATION WE COLLECT" section above. We share this information with the categories of third parties described in the "HOW WE SHARE INFORMATION" section above. Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect as well as the right to be forgotten as detailed in "HOW YOU CAN CONTROL USE OF YOUR PERSONAL INFORMATION" below. California consumers may make a request pursuant to their rights under the CCPA by contacting us using the contact information listed at the end of this privacy policy. We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

HOW YOU CAN CONTROL USE OF YOUR PERSONAL INFORMATION

There are many ways that you can exercise control over the collection, processing and use of your information, including the following.

- *Right to Consent/Revoke Consent.* In some cases, we'll ask for consent to use your information for specific purposes. Even if you provide consent, you can revoke your

consent later. If you let us use your information, you can always change your mind and simply revoke your permission by changing the settings on your device if your device offers those options or by contacting us. You have the right to opt-out of: (1) direct marketing communications; (2) automated decision-making and/or profiling; (3) our collection of sensitive personal information; (4) new processing of your personal data beyond our original purpose; and (5) transfer of your personal information outside of the European Union. Please note that if you opt-out of these, it could impact the usability of our Services.

- *Right to Corrections/Inaccuracies.* You may contact us to ask us to correct or remove any information that you think is inaccurate.
- *Right to Object.* You have the right to object to the collection or processing or use of your Personal Information. With many types of data, you can simply delete it if you don't want us processing it anymore. If there are other types of information you don't agree with us processing, you can contact us.
- *Right to Data Portability.* You have the right to download or receive a copy of the Personal Information that you have given us, in a portable format and you have the right to move it to other providers. We may ask you to verify your identity or provide additional information before we let you access or update your Personal Information. We may also limit or restrict access or update your personal information for several reasons, including, for example, that the request risks the privacy of other users or your request is restricted by applicable law. Please note that that Snap & Track is not required to give you access to or copies of any User Content that you submitted.
- *Right to be Forgotten/ Deletion of Account Information.* In many situations, you have the right to have your Personal Information permanently deleted. Upon termination of your Account, or upon your written request if your Account has not been terminated, we will delete or destroy your Personal Information if you request that in writing. Keep in mind however, that, while our systems are designed to carry out our deletion practices promptly, we cannot promise that deletion will occur within a specific timeframe and the deletion process could occur over several months. Further, there may be legal requirements to store your data and we may need to suspend those deletion practices if we receive valid legal process asking us to preserve content or if otherwise necessary to comply with law or legal process. To the extent that data or information about you does not constitute Personal Information (including, for example, your User Content), it may not be feasible to delete or destroy such data, and in such cases, that data will be made "anonymous" such that the historical information, content, logs and related information is not personally identifiable. Further, please understand that once Personal Information is deleted or destroyed, it cannot be retrieved and if you chose to re-subscribe, you will have to provide the information again. Finally, please understand that any Personal Information that you have shared, posted or made available (such as your User Content), is not within the control of Snap & Track and unable to be deleted from sources with which it was shared nor control what the possessor of that information does with it.
- *Right to Complain.* If you are a citizen of the EU, you have the right to lodge a complaint with the relevant supervisory authority if you feel your Personal Information has been processed in a way that does not meet the requirements of the General Data Protection Regulation (GDPR).
- *Right to Unsubscribe.* If you decide that you do not want to receive commercial emails from us, you can "opt-out" from receiving such emails by clicking the "unsubscribe" link provided at the bottom of every commercial email. Please note that if you choose to "unsubscribe" or "opt -out", we will still send you email relating to products or services

that you purchased from us, any communication you have sent to us or other relationship that you have with us.

- *Right to List/Notice to California Residents.* Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask for a notice describing what categories of personal customer information we share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to us at the address listed above. Residents of the European Union shall have the same rights to receive this same information.
- *Contacting Us.* To exercise any of these rights or to contact us for any reason regarding your information, you can contact us.

INTERNATIONAL CONCERNS

The Service, Website and Application are hosted in The Netherlands. If you reside in a country other than The Netherlands with laws governing data collection, use and sharing that may differ from Dutch law and you provide Personal Information with us, please note that any Personal Information that you provide to us may be transferred to The Netherlands. By providing your Personal Information, you hereby specifically and expressly agree and consent to such transfer and processing and the collection, use, and sharing set forth in this Privacy Policy or any term of use relating to the use of the Website and Application.

This Privacy Policy was last updated as of May 30, 2023