

[Privacy Policy](#)[Terms of Service](#)[Copyright Infringement](#)[Verification Program](#)

# Privacy Policy

Updated: May 2, 2019

This Privacy Statement ("Privacy Statement") explains how SnipSnap App LLC ("SnipSnap App LLC", "us", "our", and "we"), collects and uses information when you interact with us. This Privacy Statement applies to all users of SnipSnap App LLC's website published at [www.snipsnap.it](http://www.snipsnap.it) and any mobile applications (such as our iPhone and Android Applications), electronic services, social networking sites (including the SnipSnap App LLC on Facebook application), individual, business partner-specific, merchant-specific, or area-specific sites we offer that are branded "SnipSnap App LLC" and link or reference this Privacy Statement (collectively, the "Sites").

Please read this Privacy Statement carefully. If you do not agree to our practices, please do not register, subscribe, create an account, or otherwise interact with the Sites.

SnipSnap App LLC  
Attention: Legal Department  
109 S 13th Street, Suite 3S  
Philadelphia, PA 19107

## Our Privacy Statement is organized as follows:

1. Types of Personal Information We Collect
2. How SnipSnap App LLC Collects Personal Information
3. How SnipSnap App LLC Uses Personal Information
4. When and Why SnipSnap App LLC Discloses Personal Information

5. Cookies and Related Technologies
6. Your Choices
7. Accessing and Correcting Personal Information
8. Security of Personal Information
9. Notice to Residents of Countries outside the United States of America
10. Privacy Practices of Third Parties
11. Communities
12. Changes to this Privacy Statement
13. Children's Privacy
14. California Privacy Rights

## **1. Types of Personal Information We Collect**

Personal Information is information that can be used to identify, locate, or contact an individual or an Affiliate. It also includes other information that may be associated with Personal Information. We collect the following types of Personal Information:

- Contact Information that allows us to communicate with you, such as your name, postal addresses, email addresses, social media website user account names, telephone numbers, or other addresses at which you receive communications from or on behalf of SnipSnap App LLC.
- Relationship Information that helps us to understand who you are and what types of coupons you might like. This includes lifestyle, preference, and interest information; location information related to your state/province, city, or neighborhood; the types of coupons that interest you; information collected from social media interactions (such as via Facebook Connect); and demographic information (e.g., birth date, age, gender).
- Transaction Information about how you interact with the Sites, such as the coupons you view and redeem and the stores you prefer; other information about how you use our Sites, email, other communications, and applications; and how you interact with SnipSnap App LLC's merchants, business partners, and service providers.
- Location Information to help us offer you coupons for merchants nearby, if you have activated one of our mobile Sites and permitted your mobile or other location-aware device to transmit location data.

## **2. How SnipSnap App LLC Collects Personal Information**

We may ask you for Personal Information when you register, subscribe, create an account, or otherwise interact with the Sites or contact SnipSnap App LLC. For example, you may be required to provide us with Contact Information or Relationship Information in order to register for certain services.

We collect Transaction Information when you use our Site. For example, we may track the coupons you view, submit or redeem, and the comments you make to the forums, bulletin boards, discussion groups, chat rooms or other methods of communication that may be offered on or through the Sites from time to time "Communities"), or to those related to our social media pages or accounts. We use cookies and related technologies to collect information about your computer and your interaction with the Sites and our business partner websites. You can read more about cookies and other technologies in the Cookies and Related Technologies section.

We also collect Transaction Information if you contact us via telephone, email, text, postal mail, social media interaction, or other methods of communication, such as for customer support purposes.

If you use a social media platform, a mobile device or other third-party method of communication to interact with SnipSnap App LLC or the Sites, that application may have a specific privacy statement that governs the use of Personal Information related to that application. For example, if you use a SnipSnap App LLC mobile application and your mobile device's settings allow it, we may collect Location Information from your device. Our application may be designed to collect information even if you are not logged into one of the Sites. If you have questions about the security and privacy settings of your mobile device, please refer to instructions from your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

We may receive additional Personal Information from third parties. For example, we may collect Personal Information from third parties to enhance other information we have about you, to help us better understand you, and to otherwise enhance the Sites or SnipSnap App LLC services.

Furthermore, we may collect information about your location within participating stores through your mobile phone or device's Bluetooth® or similar capabilities in combination with technology implemented by and with our retail partners. We will only gather these kinds of location information if you agree to share them with us by opting-in within the SnipSnap app (either during your initial login or later) and by enabling these capabilities on your mobile device. Once you have opted-in to receive offers in-store and consented to our use of location information, the SnipSnap app will continue to collect location information (it will check location information if it is running in the background) until you opt-out, log off or use your phone's or other device's setting to disable your mobile device's applicable geolocation, GPS, Bluetooth® or similar capabilities for the app.

### 3. How SnipSnap App LLC Uses Personal Information

SnipSnap App LLC uses Personal Information to:

- Operate and improve our Sites;
- Provide users with coupons for products and services from participating merchants, including coupons based on variables such as stated and anticipated user interests, personal characteristics, or location;
- Evaluate eligibility of users for certain coupons, products or services;
- Provide card-linked offers;
- Evaluate the types of coupons, products or services that may be of interest to users;
- Track redemption of coupons and perform other analytics;
- Provide user support, including to our merchants or business partners;
- Fulfill requests for SnipSnap App LLC services;
- Communicate and provide additional information that may be of interest to you about SnipSnap App LLC and our merchants and business partners, such as SnipSnap App LLC news, special offers and coupons, announcements, and marketing materials;
- Send you reminders, technical notices, updates, security alerts and support and administrative messages service bulletins, or marketing;
- Provide advertisements to you through the Sites, third-party sites, email messages, text messages, applications, or other methods of communication;
- Administer surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our partners;
- Manage our everyday business needs such as Site administration, forum management, analytics, fraud prevention, Terms of Use or to comply with the law; and
- Allow you to apply for a job, post a video or sign up for special offers from third parties through the Site.

### 4. When and Why SnipSnap App LLC Discloses Personal Information

We may share your Personal Information as required or permitted by law as described below:

- With affiliated companies (e.g., subsidiaries and other companies owned by or controlled by SnipSnap App LLC) who may only use the Personal Information for the purposes described in Section 3 above;
- With our service providers that provide services for us such as sending emails and notifications on our behalf. Our service providers are bound by law or contract to protect Personal Information and are only allowed to use the Personal Information in accordance with the terms of our service agreements

with them;

- Merchants, but only to the extent you have redeemed a coupon offered by the merchant, or participated in an offer, contest or other activity sponsored or offered through SnipSnap App LLC on behalf of the merchant;
- SnipSnap App LLC business partners or advertisers, as part of an offer, contest, or other activity that is provided by or in conjunction with SnipSnap App LLC and its business partners and in which you have elected to participate. For example, if you are referred to SnipSnap App LLC from a business partner's website or through an invitation facilitated by or in conjunction with a SnipSnap App LLC business partner, SnipSnap App LLC may provide that business partner with Contact Information and Transactional Information to validate the referral and to support the terms of the relationship between SnipSnap App LLC and the business partner, which may allow such business partner to contact you directly and to advertise to you;
- To effect a merger, acquisition, or otherwise; to support the sale or transfer of business assets; to enforce our rights or protect our property; to protect the rights, property or safety of others, investigate fraud, respond to a government request; or as needed to support auditing, compliance, and corporate governance functions. We may also disclose Personal Information to defend ourselves in litigation or a regulatory action, and when required or advised to do so by law, such as in response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States and other countries where we operate. If SnipSnap App LLC is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or prominent notice on one or more of our Sites of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information; or
- With your consent. We encourage SnipSnap App LLC merchants and business partners to adopt and post privacy policies. However, the use of your Personal Information by such parties is governed by the privacy policies of such parties and is not subject to our control. We may also disclose information about you that is not personally identifiable. For example, we may provide our merchants, business partners, or other third parties with reports that contain aggregated and statistical data about our users.
- In addition to other information described here and in section 3. above, we may collect and share de-identified location information through methods such as mobile SDKs. This location information may be used by itself, aggregated, or combined with mobile identifiers (such as IDFAs and Android IDs), and shared with third parties, for purposes related to advertising, attribution analytics and research. You can remove your consent to having your location data collected by changing the settings on your device; certain

services may lose functionality as a result. You can opt-out from interest-based advertising through your device settings.

## 5. Cookies and Related Technologies

When you use our Sites, we collect certain information by automated or electronic means, using technologies such as cookies, pixel tags and web beacons, browser analysis tools, and web server logs. As you use our Sites and applications, your browser and devices communicate with servers operated by us, our business partners and services providers to coordinate and record the interactivity and fill your requests for services and information..

The information from cookies and related technology is stored in web server logs and also in web cookies kept on your computers or mobile devices, which are then transmitted back to our Sites by your computers or mobile devices. These servers are operated and the cookies managed by us, our business partners or our service providers.

For example, when you visit our Sites, SnipSnap App LLC and our service providers may place cookies on your computers or mobile devices. Cookies allow us to recognize you when you return, and track and target your interests in order to provide a customized experience. They also help us provide a customized experience and help us to detect certain kinds of fraud. A “cookie” is a small amount of information that a web server sends to your browser that stores information about your account, your preferences, and your use of the Sites. Some cookies contain serial numbers that allow us to connect your Site activity with other information we store about you in your profile or as related to your interactions with the Sites.

Some cookies are temporary, whereas others may be configured to last longer. “Session” cookies are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases Session cookies once you exit your browser. “Persistent” cookies are more permanent cookies that are stored on your computers or mobile devices even beyond when you exit your browser. We use Persistent cookies for a number of purposes, such as retrieving certain information you have previously provided (such as your user id if you asked to be remembered), and storing your preferences.

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions. When you access these pages or open email messages, the pixel tags



and web beacons generate a notice of that action to us, or our service providers. These tools allow us to measure response to our communications and improve our web pages and promotions.

We collect many different types of information from cookies and other technologies. For example, we may collect information from the devices you use to access our Sites, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Browsers routinely send these types of information to web servers. Our server logs also record the Internet Protocol ("IP") addresses of the devices you use to interact with the Sites. An IP address is a unique identifier that devices use to identify and communicate with each other on the Internet. We may also collect information about the website you were visiting before you came to our Site and the website you visit after you leave our Site, if this information is supplied to us by your browser.

In many cases, the information we collect using cookies and other tools is used in non-identifiable ways, without any reference to Personal Information. For example, we use information we collect about Site users to optimize our Sites and understand its traffic and usage patterns. In other cases, we associate the information we collect using cookies and related technologies with Personal Information. In that case, this Privacy Statement governs how we use that information.

Additionally, if the settings on your location-aware device allow us to receive Location Information, we will collect that automatically. If we associate Location Information with other Personal Information, this Privacy Statement governs how we would use that information too.

SnipSnap App LLC has relationships with third party advertising companies to place advertisements on our behalf onto other websites, and to perform tracking and reporting functions for our Sites and our advertisements. We do not share Personal Information with third party advertising companies; however, these third parties may automatically collect information about your visit to our Sites and other websites, your IP address, your ISP and the browser you use to visit this Site. They do this by using cookies, clear gifs and other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Site and the other websites tracked by these third parties. This Privacy Statement does not cover the collection methods or use of the information collected by these third parties, and SnipSnap App LLC is not responsible for

cookies or clear gifs in third party ads. We encourage you to review the privacy policies or statements of these third party advertising companies to learn more about their use of cookies and other technologies. If you would like more information about this practice and to know your choices about not having this information used by third party advertisers, please visit <http://www.networkadvertising.org>.

We use Google Analytics to help us understand how visitors interact with our website and to help improve our user experience.

## **6. Your Choices**

We think that you benefit from a more personalized experience when we know more about you and the kinds of coupons you like. However, you can limit the information you provide to SnipSnap App LLC, and you can limit the communications that SnipSnap App LLC sends to you.

### **Email**

You can manage your email preferences by logging into the SnipSnap Mobile App and clicking on your "Profile" link, then the double gears icon icon, and then pressing "Other Notification Settings." You can also manage your email subscriptions by following subscription management instructions contained in the commercial messages that we send you. You may choose to subscribe to some types of messages, and may choose to unsubscribe from others. You may also update your subscription preferences from time to time. If you wish to opt out of receiving offers directly from SnipSnap App LLC merchants or business partners, you can follow the opt-out instructions in the emails that they send you.

### **Cookies**

You may manage how your browser handles cookies and related technologies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. You can opt-out of being targeted by certain third party advertising companies online at [www.networkadvertising.org/consumer/opt\\_out.asp](http://www.networkadvertising.org/consumer/opt_out.asp)

### **Mobile**

If you access any of our Sites through a mobile device or mobile browser, you may manage how your Location Information is shared with SnipSnap App LLC. For example, our mobile device applications provide you the ability to opt-out



of sharing your Location Information. You may also manage how your mobile device or mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your mobile device and mobile browser settings.

## **Connecting through Social Networks**

You may manage the sharing of certain Personal Information when you register with us through a social media platform or application, such as through Facebook Connect. Please refer to the privacy settings of the social media platform or application to determine how you may adjust our permissions and manage the interactivity between SnipSnap App LLC and your social media account. By registering with SnipSnap App LLC through a social media platform, you grant SnipSnap App LLC permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network's terms of use and this Privacy Statement.

## **7. Accessing and Correcting Personal Information**

Keeping Personal Information about you current helps ensure that we offer you the best coupons available through our merchants and business partners. You can do several things to help keep Personal Information about you current. You can access, update and delete your Contact Information and the other information you provided us to use in your profile by logging into the SnipSnap Mobile App, pressing "Profile" and then "Edit Profile."

If you want to close your account or have other questions or requests, please email us at [support@snipsnap.it](mailto:support@snipsnap.it).

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [support@snipsnap.it](mailto:support@snipsnap.it). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **8. Security of Personal Information**

SnipSnap App LLC has implemented an information security program that contains administrative, technical and physical controls that are designed to reasonably safeguard Personal Information.

## **9. Notice to Residents of Countries outside the United States of America**

SnipSnap App LLC is headquartered in the United States of America. Personal Information may be accessed by us or transferred to us in the United States or to our affiliates, business partners, merchants, or service providers elsewhere in the world. By providing us with Personal Information, you consent to this transfer. We will protect the privacy and security of Personal Information according to our Privacy Statement, regardless of where it is processed or stored.

## **10. Privacy Practices of Third Parties**

This Privacy Statement only addresses the use and disclosure of information by SnipSnap App LLC through your interaction with the Sites. Other websites that may be accessible through links from our Sites may have their own privacy statements and personal information collection, use, and disclosure practices. Our merchants and business partners may have their own privacy statements, too. We encourage you to familiarize yourself with the privacy statements provided by these other parties prior to providing them with information or taking advantage of an offer or promotion.

## **11. Communities**

Our Sites may contain Communities and other areas where you may be able to publicly post information, communicate with others such as discussion boards or blogs, review products and merchants, and submit media content. Prior to posting in these areas, please read our Terms of Use carefully. All the information you post will be accessible to anyone with Internet access, and any Personal Information you include in your posting may be read, collected, and used by others. For example, if you post your email address along with a public restaurant review, you may receive unsolicited messages from other parties. Please avoid publicly posting Personal Information. If you have questions about Personal Information posted in our Communities, please contact [legal@snipsnap.it](mailto:legal@snipsnap.it).

## **12. Changes to this Privacy Statement**

From time to time, we may update this Privacy Statement to clarify our practices or to reflect new or different privacy practices, such as when we add new features to our Sites. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of notice on the Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information about our privacy practices.

### **13. Children's Privacy**

SnipSnap App LLC does not intend that any portion of the Sites will be accessed or used by children under the age of eighteen, and such use is prohibited. The Sites are designed and intended for adults. By using the Sites, you represent that you are at least eighteen years old and understand that you must be at least eighteen years old in order to create an account and purchase the goods or services advertised through the Sites. We will promptly delete information associated with any account for which we obtain actual knowledge that the registered user associated with the account is not at least eighteen years old.

### **14. California Privacy Rights**

Pursuant to Section 1798.83 of the California Civil Code, residents of California can obtain certain information about the types of Personal Information that companies with whom they have an established business relationship have shared with third parties for direct marketing purposes during the preceding calendar year. In particular, the law provides that companies must inform consumers about the categories of Personal Information that have been shared with third parties, the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. To request a copy of the information disclosure provided by SnipSnap App LLC pursuant to Section 1798.83 of the California Civil Code, please contact us via email to [legal@snipsnap.it](mailto:legal@snipsnap.it), or by writing us at the following address:

SnipSnap App LLC  
Attention: Legal Department  
109 S 13th Street; Suite 3S  
Philadelphia, PA 19107

Please allow 30 days for a response.

