

# Privacy Policy

Last updated: March 1st, 2014

This Privacy Policy explains how information about you is collected, used and disclosed by "15 and 50, LLC". and our subsidiaries (collectively, "15and50") when you use our websites, mobile applications and other online products and services (collectively, the "Services") or when you otherwise interact with us. This policy is specific to our app LeaveATrace.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our websites' homepages or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services to stay informed about our information practices and the ways you can help protect your privacy.

## Collection of Information

## Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you create an account, use the Services to send or receive a message (a "Trace"), request customer support or otherwise communicate with us. The types of information we may collect include your username, password, email address, phone number, age and any other information you choose to provide.

When you send or receive Traces, we also temporarily collect, process and store the contents of the Traces on our servers. The contents of Traces are also stored on the devices of recipients.

## Information We Collect Automatically When You Use the Services

When you access or use our Services, we automatically collect information about you, including:

Usage Information: When you send or receive Traces, we collect information about these messages, including the time, date, sender and

recipient of the Trace. We also collect information about the number of Traces sent and received between you and your friends and which friends you exchange Traces with most frequently.

**Log Information:** We log information about your use of our websites, including your browser type and language, access times, pages viewed, your IP address and the website you visited before navigating to our websites.

**Device Information:** We may collect information about the computer or device you use to access our Services, including the hardware model, operating system and version, MAC address, unique device identifier, phone number, International Mobile Equipment Identity ("IMEI") and mobile network information. In addition, the Services may access your device's native phonebook and image storage applications, with your consent, to facilitate your use of certain features of the Services. For more information about how you can control our access to these applications, please see "Your Choices" below.

**Location Information:** With your consent, we may collect information about the location of

your device to facilitate your use of certain features of our Services, determine the speed at which your device is traveling, add your local weather conditions to your Traces, and for any other purpose described in this privacy policy. For more information about how you can control our collection of location information, please see "Your Choices" below.

**Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, and this may include sending cookies to you. Cookies are small data files stored on your hard drive or in device memory that help us to improve our Services and your experience, see which areas and features of our Services are popular and count visits. We may also collect information using web beacons (also known as "tracking pixels"). For more information about cookies, and how to disable them, please see "Your Choices" below.

### Information We Collect From Other Sources

We may also obtain information from other sources and combine that with information we collect through our Services. For instance, when

you complete in-app purchases from your mobile device, we may collect information about you from the provider of your device operating system when they process the purchases on our behalf. Please note that we do not receive your payment method information from the operating system providers.

## **Use of Information**

We may use information about you for various purposes, including to:

Provide, maintain and improve our Services, including to provide additional features and content for your Traces;

Provide and deliver the products and services you request, process transactions and send you related information;

Respond to your comments, questions and requests and provide customer service;  
Send you technical notices, updates, security alerts and support and administrative messages;

Communicate with you about products, services, offers, promotions, rewards, and events offered

by 15and50 and others, and provide news and information we think will be of interest to you;

Monitor and analyze trends, usage and activities in connection with our Services;

Personalize and improve the Services and provide advertisements, content or features that match user profiles or interests;

Link or combine with information we get from others to help understand your needs and provide you with better service;

Detect, investigate and/or prevent fraudulent, unauthorized or illegal activity; and  
Carry out any other purpose for which the information was collected.

15and50 is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

## **Sharing of Information**

We may share information about you as follows or as otherwise described in this Privacy Policy:

With other users when you send them Traces, including your username and the contents of the Trace you send them. We also share your username with other users when they use our "Add Friends" feature to add you to their friend lists;

With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;

In response to legal process or a request for information if we believe disclosure is in accordance with any applicable law, rule, or regulation, or as otherwise required by any applicable law, rule or regulation;

In order to investigate or remedy potential violations of our user agreements or policies, or to protect the rights, property and safety of 15and50, our users or others;

In connection with, or during negotiations of, any merger, sale of company assets, financing or

acquisition of all or a portion of our business to another company; and

With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

## **Analytics Services Provided by Others**

We may allow others to provide analytics services on our behalf. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. 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.

We work with Parse to provide analytics in connection with the LeaveATrace mobile application. For more information about Parse's privacy practices, please visit <http://parse.com/about/privacy>. Parse is a



separate company and cannot assist with 15and50-specific issues. To contact 15and50, please email us: [support@15and50.com](mailto:support@15and50.com).

## **Security**

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

## **Your Choices**

### Account Information

You may update or correct information about yourself by editing your account settings within our Services. If you wish to delete your account, please email us at [support@15and50.com](mailto:support@15and50.com), but note that we may retain certain information as required by law, for legitimate business purposes, or as part of our regular retention practices. We may also retain cached or archived copies of information about you for a certain period of time.

### Device Information

Certain features of the Services require access to your device's native phonebook and image storage applications (e.g., to find friends or to store a Trace in your photo gallery). If you choose to find friends, the names and phone numbers in your device's native phonebook will be transmitted to 15and50. If you later decide to revoke your consent and prevent us from continuing to access your phonebook and image storage applications, you can do so by either changing the settings on your device, if this settings option is provided by your device operating system, or by following the standard uninstall process and removing our Services from your device. On iOS devices, you can grant or revoke your consent at any time and prevent us from continuing to access your phonebook and image storage applications by changing the settings on your device.

## Location

When you first launch any features of our Services that collect location information, you will be asked to consent to our collection of this information. If you initially consent to our collection of location information, you can subsequently stop the collection of this

information by changing the preferences on your mobile device. If you do so, certain features of our Services will no longer function. You may also stop our collection of location information by following the standard uninstall process to remove our Services from your device.

### Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our website.

### Push Notifications/Alerts

LeaveATrace and 15and50 may send push notifications or alerts to your device. You can deactivate these messages at any time by changing the notification settings on your device (iOS).

### Contact

To contact us, please visit <http://support.snapchat.com> or write to:

15 and 50 LLC.  
Attn: Copyright Agent  
72 Windmill Road  
Armonk, NY 10504  
[support@15and50.com](mailto:support@15and50.com)