

# Privacy Policy

## 1. Scope

Welcome! We are Social Ocean, a social commerce platform focused on providing you a beautiful, delightful, convenient, social online shopping experience. This Social Ocean Privacy Policy explains how Social Ocean, Inc (“Social Ocean”, “we”, “us” or “our”) collects, uses, discloses and otherwise processes personal information (as defined below) in connection with our services and network of websites, related content, platforms, services, products, applications, and events we provide (collectively, the “Services”). Supplemental privacy policies may be available to you depending on your additional relationship with us, for example as a Creator or Brand.

### Region-Specific Disclosures

We may choose or be required by law to provide different or additional information relating to the processing of personal information (as defined below) about residents of certain countries, regions or states. Please refer below for additional information that may be applicable to you:

- Nevada: If you are a resident of the State of Nevada, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. Although we do not currently sell covered information, please contact us using the details in the “Contact Us” section below to submit such a request.
- California: If you are a resident of the State of California in the U.S., please see our California Privacy Policy for additional California-specific privacy information.
- Our Services are currently limited to consumers in the United States. Once we open our Services to consumers located in the European Economic Area (“EEA”), the United Kingdom (“UK”) or Switzerland, we will update our Privacy Policy to include additional European-specific privacy information, including what constitutes your personal data, the lawful bases we rely on to process your personal data, how we use cookies when you access our Services from the EEA, UK or Switzerland, and your rights in respect of your personal data.

## 2. What is Personal Information?

When we use the term “personal information” in this Social Ocean Privacy Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. It does not include aggregated or de-identified information that is maintained in a form that is not reasonably capable of being associated with or linked to you.

## 3. Our Collection of Personal Information

Sometimes we collect personal information automatically when you interact with our Services and sometimes, we collect personal information directly from you. At times, we may collect personal information about you from other sources and third parties, even before our first direct interaction.

#### Personal Information Collected from Visitors to our Services and Account Holders

We may collect personal information submitted to us by you when you visit our Services and when holding an account including the following:

- Inquiry Information, including information provided in custom messages sent through the forms or contact information provided on our Services.
- Contact, Registration and Account Information, including email address, username, profile information, phone number, account balances, payment and purchase history information, and any other information you provide to us. Please note we utilize a third-party provider to process payments on our behalf and do not accept payment directly through our Services.
- Purchasing or Consuming Information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Online Marketplace and Community-Related Information, including username, photo, location, social media profiles, company name, and areas of expertise and interests.
- Survey Information, including information provided in any questions submitted through surveys, or content of any testimonials.

#### Personal Information Automatically Collected

As is true of most digital platforms, we and our third-party providers may also collect personal information from your device, browsing actions and site usage patterns automatically when you visit or interact with our Services, which may include log data (such as internet protocol (IP) address, operating system, browser type, browser id, the URL entered and the referring page/campaign, date/time of visit, the time spent on our Services and any errors that may occur during the visit to our Services), analytics data (such as the electronic path taken to our Services, through our Services and when exiting our Services, as well as usage and activity on our Services) and location data (such as general geographic location based on the log data we or our third-party providers collect). We may also automatically collect data when you shop using our Services, including data on what you purchased through affiliate links and other tracking technology. We and our third-party providers may use (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, "cookies") to automatically collect this personal information.

#### Personal Information Collected from Third Parties

We also obtain personal information from third parties; which we often combine with personal information we collect either automatically or directly from you.

We may receive the same types of personal information as described above from the following third parties:

- **Your Contacts:** When an individual chooses to share an invite to a friend to join our Services or share an image with a friend via email or text message, we may receive your information from that individual.
- **Influencers:** If you engage with individuals and entities with websites, blogs, social media presence, agents or agencies, digital publishers and other content platforms with whom we partner (“Influencers”), we may receive your information from them.
- **Business Partners:** We may receive your information from our business partners who provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our Services.
- **Service Providers:** Our service providers that perform services solely on our behalf, such as survey and marketing providers, may collect personal information and often share some or all of this information with us.
- **Information Providers:** We may from time to time obtain information from third-party information providers to correct or supplement personal information we collect. For example, we may obtain updated contact information from third-party information providers to reconnect with an individual.
- **Publicly Available Sources:** We collect personal information about individuals that we do not otherwise have, such as contact information, employment-related information, and interest-in-services information, from publicly available sources. We may combine this information with the information we collect from an individual directly. We use this information to contact individuals, to send advertising or promotional materials or to personalize our Services and to better understand the demographics of the individuals with whom we interact.

#### **4. Our Use of Personal Information**

We use the information we collect to provide relevant, useful and customized Services for free. In order to do that, we may use your information in the following ways:

- Operate, maintain, and provide to you the Services, features and functionality of the Services;
- Help you quickly find information and prevent you from having to enter information more than once;
- Administer and improve the quality and design of the Services;
- Provide customized content and services, including advertising and promotional information, such as targeted ads / retargeted ads, recommend content you might like, and cross-app / cross-site functionality across third party mobile apps and websites;
- Market and promote our Services to you and others;
- Diagnose and correct problems with the Services;
- Commission processing, payments, and reports;
- Create new features, functionality, and services;
- Communicate with you, including sending you emails regarding products or services that you have liked or may like;
- Provide customer support;

- Create device fingerprints and profiles about the possible relationships among different browsers and devices;
- Creation of consumer profiles, which may combine your personal information from one Social Ocean service with personal information and other data from other Social Ocean services or Social Ocean partners;
- Perform research and analysis on your use of the Services;
- Manage your account;
- Manage our organization and its day-to-day operations;
- Request individuals to complete surveys about our organization, organizations we partner with, and the Services;
- Protect the safety, security and integrity of the Services, as well as the property, rights and personal safety of Social Ocean, our users or others;
- Enforce the End User License Agreement and Terms of Service, this Policy and any other agreements you have entered into with Social Ocean;
- Defend, protect or enforce our rights or applicable contracts and agreements;
- Prevent, investigate or provide notice of fraud or unlawful or criminal activity; and
- Comply with legal obligations.

Where you choose to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide you with additional privacy-related information where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Social Ocean Privacy Policy. In that case, the additional privacy policy will govern how we may process the information provided at that time.

## **5. Our Disclosure of Personal Information**

We may disclose personal information in the following ways:

- **Affiliates.** We may share personal information with other companies owned or controlled by Social Ocean, and other companies owned by or under common ownership as Social Ocean, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns, particularly when we collaborate in providing the Services.
- **Brand Business Partners, Influencers and API Developers.** We may provide information about you to third-party retailers, advertisers and other businesses (“Partners”), Influencers, and Application Programming Interface (“API”) Developers. We may share anonymized geo-location data, purchased item and amount of sale with Partners and Influencers. We may combine information internally across different Services so that we may provide better and more customized services. We contract with companies who help with parts of our operations and/or to enhance our Services.
- **Survey Providers.** We share personal information with third parties who assist us in delivering our survey offerings and processing the responses.

- **Marketing Providers.** We coordinate and share personal information with our marketing providers in order to communicate with individuals about the Services we make available.
- **Customer Service and Communication Providers.** We share personal information with third parties who assist us in providing our customer services and facilitating our communications with individuals that submit inquiries.
- **Other Service Providers.** In addition to the third parties identified above, we engage other third-party service providers that perform business or operational services for us or on our behalf, such as website hosting, infrastructure provisioning, IT services, analytics services, payment processing services and administrative services.
- **Legal Obligations and Rights.** We may disclose personal information to third parties, such as legal advisors and law enforcement: (i) in connection with the establishment, exercise, or defense of legal claims; (ii) to comply with laws or to respond to lawful requests and legal process; (iii) to protect our rights and property and the rights and property of others, including to enforce our agreements and policies; (iv) to detect, suppress, or prevent fraud; (v) to protect the health and safety of us and others; or (vi) as otherwise required by applicable law.
- **Otherwise With Consent or Direction.** We may disclose personal information about an individual to certain other third parties or publicly with their consent or direction. For example, with an individual's consent or direction we may post their testimonial on our Services or service-related publications.

To facilitate our global operations Social Ocean may transfer, store, and process your information within our family of companies, partners, and service providers based in countries outside of where you reside. Laws in these countries may differ from the laws applicable to your country of residence. When we do transfer your personal information, we transfer to countries recognized as offering an equivalent level or protection or other legal mechanisms, including contracts and standard contractual clauses, so that your rights and protections travel with your data.

## **6. Links to Third Party Sites, Networks, Platforms, and Apps**

The Services may contain links to third party sites, networks – including SNS like Instagram, Snapchat, Facebook, Twitter, Pinterest or others, platforms or apps (“Linked Technologies”), including retailers and advertisers. However, please be aware that Social Ocean is not responsible for and cannot control the terms of service or privacy policies of such other Linked Technologies. We encourage you to be aware when you leave the Services, and to read the applicable agreements and privacy policies for each and every Linked Technologies. Social Ocean is not responsible for and makes no representations or warranties regarding Linked Technologies, including without limitation, the content, accuracy, opinions, functionality, or services provided in such Linked Technologies. Inclusion of any Linked Technologies on the Services does not imply approval or endorsement by Social Ocean. If you decide to access any Linked Technologies, then you do so at your own risk.

## **7. Age Restrictions; Children's Privacy**

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13 or older under the applicable age of majority of the jurisdiction of residence ("Child"). If you are a Child, you should not use our Services or otherwise provide us with any personal information either directly or by other means. If a Child has provided personal information to us, we encourage the Child's parent or guardian to contact us using the information in the "[Contact Us](#)" section below to request that we remove the personal information from our systems. If Social Ocean obtains actual knowledge that it has obtained personal information about a Child, that information will be promptly deleted from our records.

## **8. Your Choices**

Cookies and Other Tracking Technologies. You may be able to delete and/or turn off cookies as your browser or device permits. Unless you block or control cookies going forward, deleting cookies will only address cookies on your device at that moment. If you disable cookies entirely, Social Ocean Services may not function properly.

Opting Out for Location Data: You may opt out of country-level location data by using the location services controls in your mobile device's settings. Please note that this does not impact geolocation inferences, which may be possible through IP address information.

Opting Out of Push / Local Notifications: We may send push or local notifications to your device to provide updates and relevant messages. You may be able to manage notifications from the Services or through your device.

Unsubscribing from Emails: You may opt out at any time by using the Opt-Out or Unsubscribe option at the bottom of most of our email communications, or by contacting us using the information provided in the "[Contact Us](#)" section below.

Your Account: You may also choose to close your account at any time. If you are unable to close your account through our App or selected Service, please contact us using the information provided in the "[Contact Us](#)" section below with any questions.

## **9. Updates to this Privacy Policy**

We will update this Social Ocean Privacy Policy from time to time. When we make changes to this Social Ocean Privacy Policy, we will change the date at the beginning of this Social Ocean Privacy Policy. If we make material changes to this Social Ocean Privacy Policy, we will notify individuals by email to their registered email address, by prominent posting on our Services, or through other appropriate communication channels as may be required by law. All changes shall be effective from the date of publication unless otherwise provided.

## **10. Contact Us**

If you have any questions or requests in connection with this Social Ocean Privacy Policy or other privacy-related matters, please send an email to [support@socialocean.co](mailto:support@socialocean.co).

# California Privacy Policy

This California Privacy Notice ("Notice") is for California residents and supplements our Privacy Policy. It explains how we collect, use, and share your Personal Information and how to exercise your rights under the California Consumer Privacy Act ("CCPA").

When we say "Personal Information" in this Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is aggregated or information that cannot be reasonably linked to you.

## How we collect, use, and share Personal Information

To provide the products or features offered by Social Ocean ("Products"), we must process information about you, including Personal Information, whether or not you are registered or logged in. Subject to the limitations we describe in our Privacy Policy, we may share your Personal Information for business purposes with strict restrictions on how our partners can use and disclose the data we provide, at your direction, or in ways otherwise in accordance with the CCPA. We don't sell any of your Personal Information, and we never will.

## 2. COLLECTION AND USE OF PERSONAL INFORMATION

We collect personal information from and about consumers for a variety of purposes. To learn more about the types of personal information we collect, the sources from which we collect or receive personal information, and the purposes for which we use this information, please refer to our Privacy Policy.

Here is a summary of the CCPA-related categories of Personal Information we may collect about you, depending on how you use our Products, as well as how we use it and with whom we may have shared it.

- Identifiers, such as your name and email address;
- California Customer Records (Cal. Civ. Code § 1798.80(e)), such as your mailing address and phone number;
- Protected Classification Characteristics, such as your age and gender;
- Commercial Information, such as history of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet/Network Information, such as device information, log and analytics data;
- Geolocation Data, such as information about your physical location collected from geolocation features on your device, including your IP address.

- Professional/Employment Information, such as your company or employer and job title;
- Sensory Information, such as photos, videos, and recordings of any phone calls between you and Social Ocean;
- Other Personal Information, including information you submit into the feedback form and any communications between you and Social Ocean, as well as information we receive from social networking sites and address book information; and
- Inferences, such as information generated from your use of the Services reflecting predictions about your interests and preferences.

We may collect this information from the following sources: directly from you, from our business partners and affiliates, from your browser or device when you visit our Services, from Influencers or from third parties that you permit to share information with us.

### **3. DISCLOSURE OF PERSONAL INFORMATION**

As described in the “Our Disclosure of Personal Information” section of our [Privacy Policy](#), we share personal information with third parties for business purposes or we may “sell” (as that term is defined under the CCPA) your personal information to third parties, subject to your right to opt out of those sales.

The categories of third parties to whom we sell or disclose your personal information for a business purpose may include: (i) other brands and affiliates in our family of companies; (ii) our service providers and advisors; (iii) marketing and strategic partners; (iv) ad networks and advertising partners; (v) analytics providers; (vi) Influencers; and (vii) social networks.

### **4. YOUR CALIFORNIA PRIVACY RIGHTS**

As a California resident, you may be able to exercise the following rights in relation to the personal information that we collect about you (subject to certain limitations at law):



<b>The Right to Access/Know</b>	<p>You have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:</p> <ul style="list-style-type: none"> <li>• The specific pieces of personal information we have collected about you;</li> <li>• The categories of personal information we have collected about you;</li> <li>• The categories of sources of the personal information;</li> <li>• The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;</li> <li>• The categories of personal information we have sold about you (if any), and the categories of third parties to whom the information was sold; and</li> <li>• The business or commercial purposes for collecting or, if applicable, selling the personal information.</li> </ul>
<b>The Right to Request Deletion</b>	<p>You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p>
<b>The Right to Opt Out of Personal Information Sales</b>	<p>You have the right to direct us not to sell personal information we have collected about you to third parties now or in the future.</p>
<b>The Right to Non-Discrimination</b>	<p>You have the right not to receive discriminatory treatment for exercising these rights.</p> <p>However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products and Services or engage with you in the same manner.</p>
<b>“Shine the Light”</b>	<p>California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California’s “Shine the Light” law (Civ. Code §1798.83).</p>

## 5. HOW TO EXERCISE YOUR CALIFORNIA CONSUMER RIGHTS

### To Exercise Your Right to Access, Right to Know or Right to Deletion

To exercise your Right to Access, Right to Know or your Right to Deletion, please submit a request by using the email address in the “Contact Us” section below with the subject line, “California Rights Request”.

Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally either require the successful authentication of your account, or the matching of sufficient information you provide us to the information we maintain about you in our

systems. This process may require us to request additional personal information from you, including, but not limited to, your email address, phone number, and/or date of last transaction on our Services.

In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

#### Authorized Agents

In certain circumstances, you are permitted to use an authorized agent (as that term is defined by the CCPA) to submit requests on your behalf through the designated methods set forth in this CA Policy where we can verify the authorized agent's authority to act on your behalf.

For requests to know or delete personal information, we require the following for verification purposes:

1. a power of attorney valid under the laws of California from you or your authorized agent; or
2. sufficient evidence to show that you have:
  1. provided the authorized agent signed permission to act on your behalf; and
  2. verified your own identity directly with us pursuant to the instructions set forth in this CA Policy; or directly confirmed with us that you provided the authorized agent permission to submit the request on your behalf.

For requests to opt-out of personal information "sales", we require a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf.

#### Minors Under 16

We do not sell the personal information of consumers we know to be less than 16 years of age. Please contact us using the email address in the "Contact Us" section below to inform us if you, or your minor child, are under the age of 16.

#### California's "Shine the Light" Law

California's "Shine the Light" law (Civil Code Section §1798.83) provides certain rights to California residents that have an established business relationship with us with regard to the disclosure of certain types of personal information to third parties for their direct marketing purposes. To opt-out of having your personal information disclosed to third parties for their direct marketing purposes, please contact us using the email address in the "Contact US" section below and provide your contact information to be added to our suppression list.

## **6. UPDATES TO THIS CA POLICY**

We will update this CA Policy from time to time. When we make changes to this CA Policy, we will change the date at the beginning of this CA Policy. If we make material changes to this CA Policy, we may notify individuals by email to their registered email address, by prominent posting on our Services, or through other appropriate communication channels as may be required by law. All changes shall be effective from the date of publication unless otherwise provided.

## **7. CONTACT US**

If you have any questions or requests in connection with this CA Policy or other privacy-related matters, please send an email to [support@socialocean.co](mailto:support@socialocean.co).