RiTribes Privacy Policy

This policy describes the information we process to support Ritribes Comments, Engagement Tools, Private Messaging and other products and features offered by RiTribes.

What kinds of information do we collect?

To provide the RiTribes Products, we must process information about you. The types of information we collect depend on how you use our Products. You can learn how to access and delete information we collect by visiting your Profile.

Things you and others do and provide.

- Information and content, you provide. We collect the content, communications and other information you provide when you use our Products, including when you sign up for an account, create or share content, and message or communicate with others. This can include information in or about the content you provide (like metadata), such as the location of a photo or the date a file was created. It can also include what you see through features we provide, such as the Bubble, so we can do things like suggest comments and ideas that you might like, or give you tips on how to influence using commenting. Our systems automatically process content and communications you and others provide to analyze context and what's in them for the purposes described below.
 - Data with special protections: You can choose to provide information in your RiTribes profile fields or comment about your religious views, political views, who you are "interested in," or your health. This and other information (such as racial or ethnic origin, philosophical beliefs or trade union membership) could be subject to special protections under the laws of your country
- Networks and connections. We collect information about the people, accounts and
 groups you are connected to and how you interact with them across our Products, such
 as people you communicate with the most or groups you are part of. We also collect
 contact information if you choose to upload, sync or import it, which we use for things
 like helping you and others find people who share the same ideas and interests.
- Your usage. We collect information about how you use our Products, such as the types
 of content you view or engage with; the features you use; the actions you take; the
 people or accounts you interact with; and the time, frequency and duration of your
 activities. For example, we log when you're using and have last used our Products, and
 what articles, posts, videos and other content you view on our Products. We also collect
 information about how you use features like The Bubble.
- Information about transactions made on our Products. If you use our Products to increase revenue or other financial transactions, we collect information about the

- revenue or transaction. This includes payment information, such as your account details, credit or debit card number and other card information; other account and authentication information; and billing, shipping and contact details.
- Things others do and information they provide about you. We also receive and analyze content, communications and information that other people provide when they use our Products. This can include information about you, such as when others share or comment on posts, send a message to you, or upload, sync or import your contact information.

Device Information

As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our Products, and we combine this information across different devices you use. For example, we use information collected about your use of our Products on your phone to better personalize the content (including ads) or features you see when you use our Products on another device, such as your laptop or tablet, or to measure whether you took an action in response to an ad we showed you on your phone on a different device.

Information we obtain from these devices includes:

- **Device attributes:** information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Device operations:** information about operations and behaviors performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).
- Identifiers: unique identifiers, device IDs, and other identifiers, such as accounts you use.
- **Device signals:** Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.
- **Data from device settings:** information you allow us to receive through device settings you turn on, such as access to your location or photos.
- **Network and connections:** information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address and connection speed.
- Cookie data: data from cookies stored on your device, including cookie IDs and settings.
 Learn more about how we use cookies in the RiTribes Cookies Policy

Information from partners.

Advertisers, developers, and publishers can send us information through RiTribes Social commenting system, Engagement tools or management dashboard they use, including our social plug-ins (such as the Like/Dislike buttons), RiTribes Login, social logins, or the RiTribes targeting tools. These partners provide information about your activities off RiTribes—including information about your device, websites you visit, purchases you make, the ads you see, and how you use their services—whether or not you have a RiTribes

account or are logged into RiTribes. For example, a game developer could use our services to tell us what interests you, or a business could tell us about a purchase you made in its store. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information.

Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us.

To learn more about how we use cookies in connection with RiTribes Engagement Tools, review the RiTribes Cookies Policy.

How do we use this information?

We use the information we have (subject to choices you make) as described below and to provide and support the RiTribes Products and related services described in the RiTribes <u>Terms</u>. Here's how:

Provide, personalize and improve our Products.

We use the information we have to deliver our Products, including to personalize features and content (including your Social News Feeds, Recommended and ads) and make suggestions for you (such as groups or Articles you may be interested in or ideas you may want to follow) on and off our Products. To create personalized Products that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with our Products; and the people, places, or things you're connected to and interested in on and off our Products. Learn more about how we use information about you to personalize your RiTribes experience, including features, content and recommendations in RiTribes Products.

- Information across RiTribes Products and devices: We connect information about your
 activities on different RiTribes Products and devices to provide a more tailored and
 consistent experience on all RiTribes Products you use, wherever you use them. For
 example, we can suggest that you to visit a website that includes people you follow on
 RiTribes or communicate with using Private messaging. We can also make your experience
 more seamless, for example, by automatically filling in your registration information (such as
 your phone number) from one RiTribes Product when you sign up for an account on a
 different Product.
- Location-related information: We use location-related information-such as your current location, where you live, the places you like to go, and the businesses and people you're near-to provide, personalize and improve our Products, including ads, for you and others.

Location-related information can be based on things like precise device location (if you've allowed us to collect it), IP addresses, and information from your and others' use of RiTribes Products (such as comments with location).

- Product research and development: We use the information we have to develop, test and improve our Products, including by conducting surveys and research, and testing and troubleshooting new products and features.
- Ads and other sponsored content: We use the information we have about you-including
 information about your interests, actions and connections-to select and personalize ads,
 offers and other sponsored content that we show you.

Advertising is the predominant way RiTribes makes money. Advertising revenue allows RiTribes to support and improve the Service. RiTribes uses, and also engages third party ad partners and affiliates who use, [cookie IDs, device IDs (including mobile), hashed email addresses, IP address, ISP and browser information, demographic or interest data, content viewed and actions taken on the Service or Partner Sites, including information about the websites you've viewed and advertisements you've interacted within order to provide you with more relevant advertising targeted to your preferences and interests derived from your interaction with the Service, Partner Sites or other third party websites

Provide measurement, analytics, and other business services.

We use the information we have (including your activity off our Products, such as the websites you visit and ads you see) to help advertisers and other partners measure the effectiveness and distribution of their ads and services, and understand the types of people who use their services and how people interact with their websites, apps, and services.

Promote safety, integrity and security.

We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products, and promote safety and security on and off of RiTribes Products. For example, we use data we have to investigate suspicious activity or violations of our terms or policies, or to detect when someone needs help.

Communicate with you.

We use the information we have to send you marketing communications, communicate with you about our Products, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

Research and innovate for social good.

We use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of general social welfare, technological advancement, public interest, health and well-being. For example, we analyze information we have about people opinion patterns during crises to aid relief efforts.

How is this information shared?

Your information is shared with others in the following ways:

Sharing on RiTribes Products

People and accounts, you share and communicate with

When you share and communicate using our Products, for example when you express yourself on a specific website that interest you. When you use Private Messing to communicate with people or businesses, those people and businesses can see the content you send. Your network can also see actions you have taken on our Products, including engagement with ads and sponsored content. We also let other accounts see who has commented or Liked/Dislike their post.

<u>Public information</u> can be seen by anyone, on or off our Products, including if they don't have an account. This includes your RiTribes username; any information you share with a public audience; information in your profile on RiTribes; and content you share on a publisher's page. You, other people using RiTribes, and we can provide access to or send public information to anyone on or off our Products, including in other RiTribes Company Products, in search results, or through tools and APIs. Public information can also be seen, accessed, reshared or downloaded through third-party services such as search engines, APIs, and offline media such as TV, and by apps, websites and other services that integrate with our Products.

Content others share or spread about you

You should consider who you choose to share with, because people who can see your activity on our Products can choose to share it with others on and off our Products, including people and businesses outside the audience you shared with. For example, when you share a post or send a message to specific follower or accounts, they can download, screenshot, or reshare that content to others across or off our Products, in person. Also, when you comment on someone else's comment or react to their content, your comment or reaction is visible to anyone who can see the other person's content and share that content in different ways.

People can also use our Products to create and share content about you with the audience they choose. For example, people can share a photo of you in a Comment, mention or tag you at a location in a comment, or share information about you in their posts or messages across different sites. If you are uncomfortable with what others have shared about you on our Products, you can learn how to report the content.

Information about your active status or presence on our Products.

People in your networks can see signals telling them whether you are active on our Products, including whether you are currently active on Private messing or RiTribes, or when you last used our Products.

Apps, websites, and third-party integrations on or using our Products.

When you choose to use third-party apps, websites, or other services that use, or are integrated with, our Products, they can receive information about what you post or share. For example, when you fill a survey with your RiTribes community or use RiTribes comment or Share button on a website, the developer or website can receive information about your activities in the website or receive a comment or link that you share from the website on RiTribes. Also, when you download or use such third-party services, they can access your public profile on RiTribes, and any information that you share with them.. But apps and websites you use will not be able to receive any other information about your RiTribes community from you, or information about any of your RiTribes followers (although your friends and followers may, of course, choose to share this information themselves). Information collected by these third-party services is subject to their own terms and policies and not this.

New owner.

If the ownership or control of all or part of our Products or their assets changes, we may transfer your information to the new owner.

Sharing with Third-Party Partners

We work with third-party partners who help us provide and improve our Products or who use RiTribes Engagement Tools or Management Dashboard to grow their businesses, which makes it possible to operate our companies and provide free services to people around the world. We don't sell any of your information to anyone, and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide. Here are the types of third parties we share information with:

Partners who use our analytics services.

We provide aggregated statistics and insights that help people and businesses understand how people are engaging with their posts, listings, Pages, videos and other content on and off the RiTribes Products or Website. For example, Website admins and RiTribes business profiles receive information about the number of people or accounts who viewed, reacted to, or commented on their posts, as well as aggregate demographic and other information that helps them understand interactions with their comments, content or account.

Advertisers.

We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission. For example, we provide general demographic and interest information to advertisers (for example, that an ad was seen by a man between the ages of 20 and 25 who lives in Colorado and likes Nature and sports) to help them better understand their audience.

Measurement partners.

We share information about you with companies that aggregate it to provide analytics and measurement reports to our partners.

Partners offering goods and services in our Products.

When your exposed to receive content, or buy something from a seller in our Products, the content creator or seller can receive your public information and other information you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

Vendors and service providers.

We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analyzing how our Products are used, providing customer service, facilitating payments or conducting surveys.

Law enforcement or legal requests.

We share information with law enforcement or in response to legal requests under the right circumstances.

How do RiTribes work with partners?

RiTribes uses its infrastructure, systems and technology with Partners (which include websites, publishers, advertisers and technology or content companies) to provide an innovative, relevant, consistent and safe experience across all RiTribes Products you use. We also process information about you across the RiTribes partners for these purposes, as permitted by applicable law and in accordance with their terms and policies. For example, we process information from RiTribes about accounts sending spam on its service so we can take appropriate action against those accounts on The Feed across different partners. We also work to understand how people use and interact with RiTribes Products, such as understanding the number of unique users on different Partners using our Products.

How can I manage or delete information about me?

We provide you with the ability to access and erase your data.

We store data until it is no longer necessary to provide our services and RiTribes Products, or until your account is deleted - whichever comes first. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

When you delete your account, we delete your identity from comments you posted, such as your name, photos and status updates, and you won't be able to recover that information later but we don't delete the social interactions like comments or likes. Information that others have shared about you isn't part of your account and won't be deleted. If you don't want to delete your account but want to temporarily stop using the Products, you can contact our support to deactivate your account instead. To delete your account at any time, please visit Profile settings.

How do we respond to legal requests or prevent harm?

We access, preserve and share your information with regulators, law enforcement or others:

- In response to a legal request (like a search warrant, court order or subpoena) if we have a
 good faith belief that the law requires us to do so. This may include responding to legal
 requests from jurisdictions outside of the United States when we have a good-faith belief that
 the response is required by law in that jurisdiction, affects users in that jurisdiction, and is
 consistent with internationally recognized standards.
- When we have a good-faith belief it is necessary to: detect, prevent and address fraud, unauthorized use of the Products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Products), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-party partners about the reliability of your account to prevent fraud, abuse and other harmful activity on and off our Products.

Information we receive about you (including financial transaction data related to purchases made with RiTribes) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for terms violations for at least a year to prevent repeat abuse or other term violations.

How do we operate and transfer data as part of our global services?

We share information globally, both internally within the RiTribes, and externally with our partners and with those you connect and share with around the world in accordance with this policy. Your information may, for example, be transferred or transmitted to, or stored and processed in the United States or other countries outside of where you live for the purposes as described in this policy. These data transfers are necessary to provide the services set forth in the RITribesTerms and to globally operate and provide our Products to you. We utilize standard contract clauses, rely on the European GDPR about certain countries, as applicable, and obtain your consent for these data transfers to the United States and other countries.

What is the age restriction?

The Service is not intended for use by children under the age of 13. We do not knowingly collect personal information from children under 13 or knowingly allow such persons to register for an account. In the event that we learn that we have collected personal information from a child under the age of 13, we will delete it. If you believe that we might have collected personal information from a child under 13, please contact us at support@ritribes.com

How will we notify you of changes to this policy?

We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is so published. We will provide a 10-day prior notice if we believe any substantial changes are involved via any of the communication means available to us or via the Services. After such notice period, all amendments shall be deemed accepted by you.

How to contact RiTribes with questions

If you have any comments or questions about this Privacy Policy or if you have any concerns regarding your Personal Data, please contact us by email at mailto:privacy@ritribes.com

Date of Last Revision: May 15, 2019