

# PynPoints Privacy Policy

LAST UPDATED: 8/28/2015

This Privacy Policy (the “Privacy Policy”) applies to your access and use of the PynPoints Publisher website located at <http://www.pynpoints.com/> (the “Site”) and the PynPoints Subscriber iOS or Android app (the “App”) (collectively the “PynPoints Technology”) provided by PynPoints, LLC. (referred to as “PynPoints,” “we,” or “us”).

BY ACCESSING AND USING THE PYNPOINTS TECHNOLOGY, YOU AGREE THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY AND AGREE TO BE BOUND BY IT.

Remember that your use of the Site is at all times subject to the PynPoints Publisher Terms of Use located at [www.pynpoints.com/legal/publisherTOU](http://www.pynpoints.com/legal/publisherTOU) and that your use of the App is at all times subject to the PynPoints Subscriber Terms of Use located at [www.pynpoints.com/legal/subscriberTOU](http://www.pynpoints.com/legal/subscriberTOU), both of which incorporate this Privacy Policy.

WE MAY MODIFY THIS PRIVACY POLICY AT ANY TIME BY POSTING THE REVISED PRIVACY POLICY ON THE SITE. YOU CAN DETERMINE WHEN THIS PRIVACY POLICY WAS LAST REVISED BY REFERRING TO THE “LAST UPDATED” LEGEND AT THE TOP OF THIS PRIVACY POLICY. ANY MODIFICATIONS WILL BE EFFECTIVE IMMEDIATELY UPON SUCH POSTING. YOUR USE OF OR ACCESS TO THE SITE AFTER SUCH MODIFICATIONS ARE POSTED WILL SIGNIFY YOUR ACCEPTANCE OF THE MODIFICATIONS AND YOUR AGREEMENT TO BE BOUND BY THEM. NOTWITHSTANDING THE FOREGOING, ANY MODIFICATIONS TO THIS PRIVACY POLICY SHALL NOT APPLY TO ANY DISPUTE BETWEEN US ARISING PRIOR TO THE DATE ON WHICH WE POST THE REVISED TERMS THAT CONTAIN SUCH MODIFICATIONS.

## **YOUR INFORMATION**

### Personal Information You Give Us

We collect and may transmit personally identifiable information that you provide to us through the PynPoints Technology (“Your Information”). Your Information may include, but not be limited to, your name, address, e-mail address, billing information, device information, and location information.

### Information We Collect Though the Site

Whenever you interact with the Site, we automatically receive and record information from your browser. Other information collected automatically may include your IP address, the type of browser or application you are using to access the Site, and the identity of the Site page or feature you are requesting. We may use IP addresses to analyze trends, administer the Site, and gather broad demographic data for aggregate use. We may also collect information regarding the device(s) you use to access or use the Site.

To collect this information, we may use “cookies” or other tracking technologies to track how you use the Site. We also may send instructions to your computer or device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with the Site. A cookie is a file stored on your computer or device to uniquely identify your browser or to store information or settings on your computer or device. If applicable, our advertising partners may also

transmit cookies to your browser, application, or mobile device when you click on ads that appear on the Site. Clicking on a link to a third party website from our Site may also allow that third party website to also transmit cookies to you.

We may also use “web beacons”, i.e. “web bugs” or “single-pixel” or “clear” GIFs, on the Site. Web beacons allow ad networks to provide anonymized, aggregated auditing, research, and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their website.

You may adjust your web browser software if you do not wish to receive cookies or web beacons, but this may prevent you from taking advantage of some of the Site’s features. Please refer to your browser or email software instructions or help screen to learn more about these functions. PynPoints does not recognize “do not track” signals from your web browser. Be sure to review the privacy policy of any third party website you visit because this Privacy Policy does not cover the use of cookies or web beacons by any third parties. You may also request to opt-out of an advertiser’s use of cookies by visiting the National Advertising Initiative or the Digital Advertising Alliance. You may request to opt-out of Google’s use of cookies by visiting [www.google.com/ads/preferences](http://www.google.com/ads/preferences). All applicable terms on these websites will apply to your request to opt-out in addition to this Privacy Policy.

#### Information We Collect Through the App

The App automatically collects certain information that may personally identify users who access or use the App. Your Information includes, but is not limited to, your mobile device state information, unique device identifiers (“UDID”), device hardware and OS information, information relating to how an application functions on your mobile device, and the physical location of your mobile device.

We may use this information to analyze trends, administer the App, and gather broad demographic data for aggregate use. We may also collect information regarding the device(s) you use to access or use the App, including without limitation the information described above.

### **HOW WE USE AND DISCLOSE YOUR INFORMATION**

#### Non-Personal Information

We may use and share non-personal, de-identified information (i.e. information that cannot be used to identify you) for any lawful business purpose without any obligation or accounting to you. For example, we can use non-personal information for developing products, services, and providing those offerings to other users and third parties. We may use your personal information to generate non-personal information. When we do so, we will take reasonable measures to ensure that the non-personal information is no longer personally identifiable and cannot later be used to identify you. We may also disclose non-personal, aggregate, anonymous data in a de-identified format to investors and potential partners based on information collected from users.

#### Personal Information

We may use and disclose Your Information collected through the PynPoints Technology (i) to perform the services described on the Site and in the App; and (ii) to contact you regarding our services. We may combine and enhance Your Information with information we receive from third parties as long as we use

the combined information as described in this Privacy Policy. We may also use information collected through the PynPoints Technology for research regarding the effectiveness of the PynPoints Technology and our business planning, marketing, advertising, and sales efforts. We may disclose Your Information to perform our services as permitted by law and our contracts with our customers.

We may employ other companies and people to perform tasks on our behalf and we may need to share Your Information with them to provide services to you. Unless we tell you differently, they do not have any right to use Your Information beyond what is necessary to assist us.

We may also disclose Your Information at the request of law enforcement or government agencies or in response to subpoenas, court orders, or other legal process to establish, protect, or exercise our legal or other rights or to defend against a legal claim or as otherwise required or allowed by law. We may disclose Your Information in order to protect the rights, property, or safety of a user or any other person. We may disclose Your Information to investigate or prevent a violation by you of any contractual or other relationship with us or your illegal or harmful activity.

### Mobile Device Information

We use technologies, such as location based information, to provide you with tailored information and features as you use the PynPoints Technology. When you access the App on your mobile device (“Mobile Device”), we will obtain information from your Mobile Device about the type of Mobile Device you are using. We may use this information to notify you of features and products that may be available on your Mobile Device. Certain features may require our collection of the phone number of your Mobile Device. We may link that phone number to the Mobile Device identification information, but will not use that number for telemarketing. In addition, some mobile network providers (“Mobile Provider”) in the U.S. are required to use technology that tracks the physical location of Mobile Devices that use their service. WE OFFER SERVICES THAT USE TECHNOLOGY THAT TRACKS THE PHYSICAL LOCATION OF YOUR MOBILE DEVICE (“PINPOINTING”), AND YOU UNDERSTAND AND CONSENT TO OUR USING PINPOINTING INFORMATION FROM YOUR MOBILE DEVICE. WE MAY USE AND STORE THIS PINPOINTING INFORMATION TO PROVIDE LOCATION-BASED SERVICES, INCLUDING LOCATION-TARGETED ADVERTISING. Most Mobile Devices provide users with the ability to disable location services. These controls are usually located in the Mobile Device's settings menu. If you have questions about how to disable your Mobile Device's location services, we recommend you contact your Mobile Provider or your Mobile Device manufacturer.

## **PROTECTION OF YOUR INFORMATION**

Protecting your Site and App login credentials (i.e. your username and password) from unauthorized access is your responsibility. You may not share your login credentials with any third party. We recommend you log out after accessing your account, change your password on a periodic basis, and limit access to your computer or device and its browser. While we use commercially reasonable security measures to prevent unauthorized persons from accessing our files or tampering with the PynPoints Technology, we cannot guarantee that these efforts will always be successful. We do not represent, warrant, or guarantee that our safeguards will protect the total privacy of Your Information disclosed on the PynPoints Technology. Your Information may be accessed and viewed by other Internet users, without your knowledge and permission, while in transit to or from us. We cannot and do not ensure, represent, warrant, or guarantee the security of any information you transmit through the PynPoints Technology.

## **RETENTION OF YOUR INFORMATION; MODIFICATION**

### Correcting, Updating, Accessing, or Removing Personal Information

You can correct, update, or remove Your Information if it changes or if you no longer want to receive information from PynPoints beyond information related to our services. This can be done by emailing a request to us at support@pynpoints.com. You may also request access to Your Information collected by us by sending a request to us at support@pynpoints.com. We may not be able to completely remove Your Information from our systems in certain circumstances. For example, we may retain Your Information for legitimate business purposes, our customer requirements, or if it may be necessary to prevent fraud or future abuse, for account recovery purposes, if required by law, or as retained in our data backup systems or cached or archived pages. All of Your Information that we keep will continue to be subject to the terms of the Privacy Policy to which you have previously agreed.

### Your California Privacy Rights

California law permits users that are residents of California to request the following information regarding our disclosure of your personal information to third parties for those third parties' direct marketing purposes (i) a list of certain categories of personal information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year; (ii) the identity of certain third parties that received personal information from us for their direct marketing purposes during that calendar year; and (iii) examples of the products or services marketed (if we have that information). If you are a California resident and would like to make such a request, please email us at support@pynpoints.com.

## **THIRD-PARTY PRIVACY POLICIES**

The PynPoints Technology will include or provide links to other websites on the Internet that we do not control. Even if an affiliation exists between PynPoints and a third party website, each of these linked sites maintains its own independent privacy and data collection policies and procedures. While we expect our customers and affiliates to respect the privacy of our users, we cannot be responsible for the actions of third parties. We encourage you to consult that website's privacy policy before providing Your Information to it and whenever interacting with any website.

## **DISCLOSURE OF CUSTOMER INFORMATION THROUGH BUSINESS TRANSFERS**

We may buy, merge, or partner with other companies or businesses and in so doing, acquire or transfer information. Your Information collected through the website may be among the transferred business assets. In the event that a portion or substantially all of our assets are sold or transferred to a third party, Your Information would likely be a transferred business asset, and you hereby agree to such a transfer.

## **USERS FROM OUTSIDE THE UNITED STATES**

The PynPoints Technology is hosted in the United States and is governed by United States law. If you are using the PynPoints Technology from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using the PynPoints Technology, you consent

to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Privacy Policy.

## **NO CHILDREN**

The PynPoints Technology is not for use by those under the age of 13. If you use the PynPoints Technology, you hereby represent and warrant that you are at least 13 years of age. In compliance with the Children's Online Privacy Protection Act, any information we receive from users we believe to be under the age of 13 will be purged from our database.

## **CONTACT US**

With questions, e-mail [support@pynpoints.com](mailto:support@pynpoints.com).

Print or download a copy of this Privacy Policy for your records.