The People Platform™
Privacy Policy

Effective Date: 8/30/2018

Overview

The People Platform™ is owned and operated by Epicenter Experience LLC “Company”. Company takes your privacy seriously. We recognize that privacy is an important issue, so we design and operate our services with the protection of your privacy in mind.

By visiting or using any Company's applications, website and services, and any other linked pages, features, content, or any other services we offer from time to time by in connection therewith (collectively, the "Services"), you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Types of Information Collected

The term "personally identified information” “PII" as used in this Privacy Policy refers to personally identifiable information that specifically identifies an individual (such as an individual's first and last name, address, telephone number, e-mail address, credit card or other account number), and information about that individual or such individual's activities or preferences when such information is directly linked to personally identifying information. The Services collect Personal Data when you interact with it: for example, when you collect rewards, check-in to locations, submit postings; register for membership services; respond to questions; register for opportunities; or seek help from our customer service departments. We also may collect information when you purchase products or services offline. Because providing detailed information regarding our privacy policy when you register or providing information in connection with these other services often proves impractical, you may instead be provided with a short notice that reminds you to refer to this Privacy Policy and other relevant information from us. We may also obtain Personal Data from reputable third parties, such as partnering app developers.

Personal information does not include "aggregate" information, which is data we collect about the use of the Sites or categories of Site users, from which any personal information has been removed. We may collect aggregate data for a number of purposes, including improving the Service, to diagnose technical issues, to help identify user needs so that we can better consider new products and services, and to tailor

existing products and services to better serve our users. This Privacy Policy in no way limits or restricts our collection, use or disclosure of aggregate information.

How we collect and use information

We may collect the following types of information:

- **Information you provide.** When you sign up for some of our products, we ask you for personal information. We may combine the information you submit under your account with information from other Company services or third parties in order to provide you with a better experience and to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.
- **Cookies.** When you visit the Company, we send one or more cookies to your computer or other device. We use cookies to improve the quality of our service, including for storing user preferences, improving products and ad selection, and tracking user trends, such as how people use our services. Company also uses cookies in its services to help brands gain insights and obtain direct feedback from users in regard to their experiences.
- **Unique Device ID.** The Company offers customers several methods that enable Company to measure user activity, manage gift card earnings, manage user accounts, assess performance , ad effectiveness and detect fraudulent access and general usage across the Company network of web sites and applications. These methods may include but are not limited to the use of unique device-specific identifiers that are found in most mobile devices, such as the IDFA, UDID, Android ID, MEID and others, in either a raw, hashed or otherwise obfuscated format. These methods also may include the use of a unique server-generated network token, either anonymous or known, that is stored on the device as a cookie or as a user default setting. It is up to the publisher of the underlying application and/or web site to decide which methods are appropriate and consistent with their privacy policy. These methods allow Company to record activities such as achievements earned, displayed and claimed, track mobile balances and measure engagement with Company activities.
- **Log information.** When you access Company services via a browser, application or other client our servers automatically record certain information. These server logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account.
- **User communications.** When you send email or other communications to Company, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. When you send and receive SMS messages to or from one of our services that provides SMS functionality, we may collect and maintain information associated with those

messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction. We may use your email address to communicate with you about our services.

- **Affiliated Company Services on other sites.** We offer our services on or through other web sites. Personal information that you provide to those sites may be sent to Company in order to deliver the service. We process such information under this Privacy Policy.
- **Third Party Applications.** Company may make available third party applications, such as mobile applications, gadgets or extensions, through its services. The information collected by Company when you enable a third party application is processed under this Privacy Policy. Information collected by the third party application provider is governed by their privacy policies.
- **Location data.** Company offers location-enabled services, sometimes part of another application. If you use those services, Company may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location (such as a cell ID).
- **Unique application number.** Certain services include a unique application number that is not associated with your account or you. This number and information about your installation (e.g., operating system type, version number) may be sent to Company when you install or uninstall that service or when that service periodically contacts our servers (for example, to request automatic updates to the software).

In addition to the above, we may use the information we collect to:

- Provide, maintain, protect, and improve our services (including advertising services) and develop new services; and
- Protect the rights or property of Company or our users.

If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

Disclosure of Your Data

Like many businesses, we sometimes hire third party vendors to perform certain business-related functions on our behalf, such as hosting specific portions of the Service, maintaining databases, delivering content, sending emails, administering contents, mailing information, processing payments, or otherwise operating the Services. When we employ a third party vendor to perform these functions, that third party vendor will only be provided with the particular Personal Data or Aggregate Data it needs to perform its function, and is required to protect such Personal Data and/or Aggregate Data.

In addition, we enter into relationships with partners/app developers who provide services to you, sell items or provide promotions to you. Company can provide Personal Data and/or Aggregate Data to those partners for remarketing purposes and for monitoring performance metrics.

Links to other sites

Please note that, while using the Services, you could be directed to other sites that are developed and administered by people or companies not affiliated with or controlled by Company. These other sites may place their own cookies on your computer, collect data or solicit personal information.

We suggest that when you link to another site you review that site's privacy policy, as it may be different from this Privacy Policy. Company is not responsible for the actions of those people or companies, the content of their sites, the use of information you provide to them, or any products or services they may offer. Our link to those sites does not constitute our sponsorship of, or affiliation with, those people or companies.

Social Networking Services

One of the features of the Service is that it allows you to enable or log in to the Services via various social networking services including but not limited to Facebook, Twitter, Pinterest, Snap Chat ("Social Networking Service(s)"). To take advantage of this feature, we will ask you to log into or grant us permission via the relevant Social Networking Service. When you add a Social Networking Services account to the Service or log into the Service using your Social Networking Services account, we will collect relevant information necessary to enable the Service to access that Social Networking Service and your data contained within that Social Networking Service. As part of such integration, the Social Networking Service will provide us with access to certain information that you have provided to the Social Networking Service, and we will use, store and disclose such information in accordance with this Privacy Policy. However, please remember that the manner in which Social Networking Services use, store, and disclose your information is governed by the policies of such third parties, and Company shall have no liability or responsibility for the privacy practices or other actions of any Social Networking Services that may be enabled within the Service.

You may also have the option of posting your Services activities to Social Networking Services when you access content through the Services (for example, you may post to Twitter that you performed an activity on the Service); you acknowledge that if you choose to use this feature, your friends, followers and subscribers on any Social Networking Services you have enabled will be able to view such activity.

How we protect your personal information

Company Services uses reasonable efforts to protect your personal information against unauthorized access and unauthorized alteration, disclosure or destruction. However, we cannot guarantee that your personal information will be absolutely protected. For example, your personal information may be affected by actions outside of our control, such as computer "hacking" and physical theft. You acknowledge that you provide your personal information at your own risk.

Retention of Personal Information

Company Services will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Child-specific terms

Company understands that children's privacy is important. We encourage parents and legal guardians to spend time with their age-appropriate children using the Services to be fully familiar with the Service features. By using or logging into the Service, we may ask users for their age. By using or logging into the Service or related features, you agree to respond truthfully and accurately about your age.

Children Under the Age of 13: The Service is prohibited to children under the age of 13. We will not knowingly collect or use Personal Data from anyone under 13 years of age. Children under the age of 13 years of age are expressly prohibited from submitting or posting any Personal Data on the Service.

Children Between the Ages of 13 and 18: If you are between the ages of 13 and 18, please be sure to read this Privacy Policy with your parent and obtain his or her permission before you submit or post any Personal Data on the Service, and before you use any features or offerings of the Service.

Changes to this privacy policy

We may change this Privacy Policy at any time. We will post all changes to this Privacy Policy on this page and will indicate at the top of the page the modified policy's effective date. We therefore encourage you to refer to this page on an ongoing basis so that you are aware of our current privacy policy. Your continued use of the Company Services constitutes your agreement to the Privacy Policy as modified.

Contact us

If you have any questions or suggestions regarding this Privacy Policy, please contact us at info@epicenterexp.com.