

SWOOPME, INC.

PRIVACY POLICY

Welcome to Swoop, the online and mobile service(s) of SwoopMe, Inc. (“**Swoop**,” “**we**” or “**us**”). Swoop is committed to protecting the privacy of all visitors, users and others who access our application (“**you**,” or “**Users**”). This Privacy Policy applies to our website and online service, as well as the Swoop mobile apps for mobile devices running various operating systems such as iOS and Android (collectively the “**Service**”). This Privacy Policy applies only to the practices of companies we own, control, or are united with under common control. By accessing or using our Service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

All capitalized terms that are not defined herein have the meanings given them in the [Swoop Terms of Use Agreement](#).

1. INFORMATION WE COLLECT

Generally. We collect personal information from our users in order to provide you with a personalized, useful, and efficient experience. This information is collected in various forms and in various places throughout the Services, including account registration forms, contact forms, and when you otherwise interact with us. The categories of information we collect can include:

- **Information you provide.** We may collect and store personal information you enter in our Service or provide to us in some other manner, including your name, email address, mobile phone number, user name and password. In order to create your account, the Service may access certain photographs and other content stored on your mobile device, on third party websites, or other places such content may be stored. We may also collect any communications between you and Swoop, as well as any information you provide if you take part in any interactive features of the Service. If you choose to upload a photo when registering for our Services, the photo may be viewable by us and by our Third Party Providers so that they are able to verify your identity.
- **Information we receive from social networking sites.** When you interact with our site through various social media, such as when you login or share through Facebook or other social media platforms, we may receive information from the social network including your profile information, profile picture, gender, user name, user ID associated with your social media account, age range, language, country, friends list, and any other information you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.
- **Information about others.** With your permission, Swoop may access various contact lists you make available to us (e.g., via your mobile device) in order to invite your friends and contacts to connect with our Service.
- **Metadata.** Swoop collects metadata. Metadata typically consists of how, when, where and by whom a piece of content was collected and how that content has been formatted.

- **Mobile data.** Our Services are provided primarily via a mobile application. Swoop collects certain technical data and related information, including but not limited to technical information about your device, system and application software, and peripherals, to facilitate the provision of software updates, product, support, and other related services. This information may include, but is not limited to your preferred language, phone number or other unique device identifier assigned to your mobile device, the IP address, manufacturer, and model of your mobile device, your mobile operating system and the mobile internet browser(s) you are using, geolocation and usage data, and other information used to allow us to personalize the Services for you.

We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages and push notifications, and permit you to share your creations on the Service with your contacts or social media sites. We may also send you Service-related emails or messages (e.g., account verification, order confirmations, change or updates to features of the Service, technical and security notices). For more information about your communication preferences, see “Your Choices Regarding Your Information” below.

Use of cookies and other technology to collect information.

We automatically collect certain types of usage information when you visit our website or use our Service. When you visit the Service, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click, how frequently you access the Service, and other actions you take on the Service), and allow us to track your usage of the Service over time. We may collect log file information from your browser or mobile device each time you access the Service. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, information about your mobile device, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our Users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser or mobile device, including the pages you visit, your use of third party applications, and other information that assists us in analyzing and improving the Service. We may receive reports from third party analytics providers, which we may combine with the personal data we collect from you directly.

We use or may use the data collected through cookies, log file, device identifiers, geolocation data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including advertising; (c) provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website and our Service; (e) diagnose or fix technology problems; (f) otherwise to plan for and enhance our Service; and (g) generally to provide the Services to you (e.g., using geolocation data to send a Third Party Provider to your location).

2. SHARING PERSONAL INFORMATION WITH THIRD PARTIES

We may share your personal information in the instances described below. For further information on your choices regarding your information, see “Your Choices Regarding Your Information” below.

We may also share your personal information with:

- Other companies owned by or under common ownership as Swoop, 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. These companies will use your personal information in the same way as we can under this Policy;
- Third party vendors, consultants and other service providers that perform services on our behalf or in order to carry out their work for us, which may include identifying and serving targeted advertisements, content or service fulfillment, or providing analytics services;
- Our business partners who offer a service to you jointly with us, for example, when running a co-sponsored contest or promotion;
- Third parties who we think may offer you products or services you may enjoy;
- Third parties at your request. For example, you may have the option to share your Swoop videos with your friends through email, SMS text, or various social media sites;
- The public at your request;
- Other parties in connection with any company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy or related or similar proceedings; and
- Third parties as required to (a) satisfy any applicable law, regulation, subpoena/court order, legal process or other government request, (b) enforce our Terms of Use Agreement, including the investigation of potential violations thereof, (c) investigate and defend ourselves against any third party claims or allegations, (d) protect against harm to the rights, property or safety of Swoop, its users or the public as required or permitted by law and (e) detect, prevent or otherwise address criminal (including fraud or stalking), security or technical issues.

We may also share information with others in an aggregated and anonymous form that does not reasonably identify you directly as an individual.

3. YOUR CHOICES REGARDING YOUR INFORMATION

- **Marketing Communications.** If you do not wish to receive promotional emails, you can click the “unsubscribe” button on promotional email communications. Note that you are not permitted to unsubscribe or opt-out of non-promotional messages regarding your account, such as account verification, password or local area number requests, order confirmations, change or updates to features of the Service, or technical and security notices.

- **Online Advertising and Tracking.** We permit third parties, such as ad networks and analytics providers, to collect information about your use of our website over time, in order that they may display ads that may be relevant to your interests or provide us with enhanced demographic and analytic information about our users. Typically, the information we share with these types of third party providers is provided through cookies or similar tracking technologies. The only way to completely “opt out” of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device. Please refer to your browser’s or mobile device’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. (To learn more about cookies, clear gifs/web beacons, and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative’s online resources, at <http://www.networkadvertising.org>. You can also visit <https://tools.google.com/dlpage/gaoptout/> to learn how to opt-out of Google Analytics). Depending on your mobile device, you may not be able to control tracking technologies through settings.
- **Data Retention.** We will retain your information for as long as your account is active or as needed to provide you the Service. Following termination or deactivation of your account, Swoop may retain information for a commercially reasonable time for backup, archival, and/or audit purposes. Please contact us at privacy@joinswoop.com if you wish to delete your account. Please be aware that we will not be able to delete any content you have shared with others or with social media sites.

4. SECURITY AND STORAGE OF INFORMATION

Swoop cares about the security of your information and uses commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information we collect and that we share with our service providers. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

Your information collected through the Service may be stored and processed in the United States or any other country in which Swoop or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which Swoop or its parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

5. PERSONS UNDER THE AGE OF 13

Swoop does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register for the Service without their parent or legal guardian’s consent. In the event that we learn that we have collected personal information from a child under age 13 without parental consent, we will delete that information as quickly as possible. If you

believe that we might have any information collected from a child under 13 without parental consent, please contact us at privacy@joinswoop.com.

6. LINKS TO THIRD-PARTY WEBSITES

The Service may contain links to and from third party websites of our business partners, advertisers, and social media sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

7. UPDATES TO THIS PRIVACY POLICY

We reserve the right to modify this Policy from time to time. If we make any changes to this Privacy Policy, we will change the "Last Revision" date below and will post the updated Privacy Policy on this page.

8. CONTACTING US

If you have questions about this Policy, please contact us at privacy@joinswoop.com.

9. LAST REVISION DATE

This Privacy Policy was last revised on, and effective as of, 3/3/2015.