

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 and company information you enter in our Service or provide to us in some other manner, including your name, email address, and mobile phone number.
- **Mobile data.** 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, including connecting you with third parties, as well as to communicate directly with you, such as to send you email messages and push notifications. We also use this information to improve our products and services, and to offer you solutions from partner companies that we believe would be of value. 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 collect information through the use of “cookies” to save your preferences, enable you to log in faster and enhance your navigation through our site. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help websites and apps recognize your browser. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use the Swoop platform. You should consult your web browser(s) to modify your cookie settings.

We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service.

2. SHARING INFORMATION WITH THIRD PARTIES

We will not disclose without your authorization or sell your proprietary company or personal information, this includes restrictions against access by our parent company and other affiliates. Information protected under our privacy policy covers your proprietary information you provide us, such as your company’s personnel, phone numbers, email addresses, client accounts, contracted rates with your client accounts, transaction volume, revenue, and tax identification number.

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 share your personal information with:

- Other companies owned by Swoop, which also includes our subsidiaries (i.e., any organization we own or control), but not our parent company or other affiliates. 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;

- Aside from our parent company and its subsidiaries, other parties in connection with any future 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.
- **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.

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. We protect the security of your personal and company information by using Transport Layer Security (TLS), which encrypts information you input to our system. All data is stored encrypted in our database.

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.

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. 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.

7. CONTACTING US

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

8. LAST REVISION DATE

This Privacy Policy was last revised on, and effective as of, 01/22/2018.