

# iBleat Privacy Policy

Last Updated on August 2017

This iBleat Privacy Policy is effective immediately. This Privacy Policy describes our policies on the collection, use, and disclosure of information about you in connection with your use of our services, including those offered through our websites, emails, and mobile applications (collectively, the "Service"). When you use the Service, you consent to our collection, use, and disclosure of information about you as described in this Privacy Policy.

The terms "we", "us", "our" and "iBleat" refer to iBleat Holdings USA a company domiciled in Delaware USA. The terms "You" and "Your" refer to you as a user of the Service and our iBleat App. A "User" is someone who accesses, browses, or in any way uses iBleat or the site. A "Bleat" refers to Content that you submit or transmit to, through or in connection with iBleat or the site. "Content" means text, images, photos, audio, videos, location data, and all other forms of data or communication. "Your Bleat" means Content that you submit or transmit to, through, or in connection with iBleat or the site, such as ratings, reviews, compliments, invitations, check-ins, messages, and any information that you publicly display or post or are displayed in your account profile. "User Bleat" means Content that users submit or transmit to, through, or in connection with the site or iBleat. "iBleat Content" means Content that we create and make available in connection with iBleat or the site. "Third Party Content" means Content that originates from parties other than iBleat or its users, that is made available in connection with iBleat or the site. "Site Content" means all the Content that is made available in connection with the site and or iBleat, including Your Bleat, User Bleat, Third Party Content and iBleat Content.

## INFORMATION COLLECTED & HOW WE USE IT

We may collect and store information about you when you use the Service. We use the information to fulfill your requests, provide the Service's functionality, improve the Service's quality, personalize your experience, track usage of the Service, provide feedback to third party businesses that are listed on the Service, display relevant advertising, market the Service, provide customer support, message you, back up our systems and allow for disaster recovery, enhance the security of the Service, and comply with legal obligations. Among the information we collect, note:

- A. **Account Information:** When you create an account on iBleat, we may store and use your full name, email address, and other information you may provide with your account, such as your gender and birth date. Your first names and or initials, as well as any photo you submit through the registration process, may be publicly displayed as part of your account profile.
- B. **Public Content:** The information that you contribute through the Service is intended for public consumption, including Your Bleats, tips, photos, videos, comments, likes, posts, Events, bookmarks, friends, lists, compliments, and account profile. We may display this information through the Service, share it with businesses, and further distribute it to a wider audience through third party sites and services.
- C. **Contacts:** You can invite your friends to join the Service by providing us with their contact information, or by allowing us to access your contacts from your computer, mobile device, or third party sites to select which friends you want to invite. If you allow us to access your contacts, we may transmit that information to iBleat long enough to process your invitations.

D. **Communications:** When you sign up for an account or use certain features, you are opting to receive messages from us and other iBleat users, and other businesses including businesses that receive Your Bleats. We may also track your actions in response to the messages you receive from us or through the Service, such as whether you deleted, opened, or forwarded such messages. If you exchange messages with others through the Service, we may store them in order to process and deliver them, allow you to manage them, and we may review and disclose them in connection with investigations related to the operation and use of the Service. We may not deliver messages that we believe are objectionable, such as spam messages or requests to exchange reviews for compensation. We may also store information that you provide through communications to us, including from phone calls, letters, emails and other electronic messages, or in person.

E. **Activity:** We may store information about your use of the Service, such as your search activity, the pages you view, the date and time of your visit, businesses you contact using our mobile applications. We also may store information that your computer or mobile device provides to us in connection with your use of the Service, such as your browser type, type of computer or mobile device, browser language, IP address, mobile carrier, phone number, unique device identifier, advertising identifier, location (including geolocation, beacon based location, and GPS location), and requested and referring URLs. You may be able to disallow our use of certain location data through your device or browser settings, for example by disabling "Location Services" for the iBleat application in privacy settings.

## **COOKIES**

We, and third parties with whom we partner, may use cookies, web beacons, tags, scripts, local shared objects such as HTML5 and Flash (sometimes called "flash cookies"), advertising identifiers (including mobile identifiers such as Apple's IDFA or Google's Advertising ID) and similar technology ("Cookies") in connection with your use of the Service, third party websites, and mobile applications. Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit information about you and your use of the Service, such as your browser type, search preferences, IP address, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Cookies may be persistent or stored only during an individual session.

**Managing Cookies:** It may be possible to disable some (but not all) Cookies through your device or browser settings, but doing so may affect the functionality of the Service. The method for disabling Cookies may vary by device and browser, but can usually be found in preferences or security settings. For example, iOS and Android devices each have settings that are designed to limit forms of ad tracking. Please note that changing any of these settings does not prevent the display of all advertisements to you.

## **THIRD PARTIES**

Third parties may receive information about you as follows:

A. **Advertisers:** We may allow third parties to use Cookies through the Service to collect the same type of information for the same purposes as iBleat does for itself. In doing so, iBleat adheres to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. Third parties may be able to associate the information they collect with other information they have about you from other sources. We do not necessarily have access to or control over the Cookies they use, but you may be able to opt out of some of their practices.

Please note that opting out does not prevent the display of all advertisements to you. Additionally, we may share non-personally identifiable information from or about you with third parties, such as location data, advertising identifiers, or a cryptographic hash of a common account identifier (such as an email address), to facilitate the display of targeted advertising.

You may be able to limit our sharing of some of this information through your mobile device settings, as described in Section 2 above.

- B. **Service Providers:** We may rely on third party providers to support or provide some of the services that are available through the Service. We may also rely on third party providers to perform certain services for us in connection with your use of the Service, such as communications and hosting services, network security, technical and customer support, tracking and reporting functions, quality assurance testing, payment processing, our own marketing of the Service, and other functions. We may share information from or about you with these third party providers so that they can perform their services or complete your requests. These third party providers may share information with us that they obtain from or about you in connection with providing their services or completing your requests. Third party providers may also share this information with their subsidiaries, joint ventures, or other companies under common control. Some of our web pages utilize framing techniques to serve content to you from our third party providers, while preserving the look and feel of the Service. In such cases, please note that the information you provide is being provided to the third party.
- C. **Aggregate Information:** We may share user information in the aggregate with third parties, such as advertisers and content distributors. For example, we may disclose the number of users that have been exposed to, or clicked on, advertisements.
- D. **Business Transfers:** We may share information from or about you with our parent companies, subsidiaries, joint ventures, or other companies under common control, in which case we will require them to honor this Privacy Policy. If another company acquires iBleat or all or substantially all of our assets, that company will possess the same information, and will assume the rights and obligations with respect to that information as described in this Privacy Policy.
- E. **Businesses utilizing iBleat:** We may share information from or about you (such as your age and gender), your devices, and your use of the Service (such as which businesses you Bleat or call) with businesses listed on iBleat. Keep in mind that businesses may see your Public Content (as defined in Section 1(b) above) and receive information about your transactions with them, regardless of your settings. Additionally, if you Bleat to a business through or in connection with your use of the Service, we may share information about with the business that the business would have received had you contacted them directly, such as the date and time of your Bleat and your phone number.
- F. **Investigations:** We may investigate and disclose information from or about you if we have a good faith belief that such investigation or disclosure (a) is reasonably necessary to comply with legal process and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us; (b) is helpful to prevent, investigate, or identify possible wrongdoing in connection with the Service; or (c) protects our rights, reputation, property, or that of our users, affiliates, or the public, such as disclosures in connection with our Consumer Alerts program. If you flag or otherwise complain and Bleat about content through the Service, we may share the substance of your complaint with the contributor of that content in order to provide an opportunity for the contributor to respond.

G. Links: The Service may contain links to unaffiliated third party services. Except as set forth herein, we do not share your personal information with them, and are not responsible for their privacy practices. We suggest you read the privacy policies on or applicable to all such third party services.

H. Third Party Accounts: If you sign up for iBleat using a third party service like

Facebook, or link your iBleat account to your account with a third party service like Facebook or Twitter, we may receive information about you from such third party service.

### **CONTROLLING YOUR PERSONAL DATA**

Other users may be able to identify you, or associate you with your account, if you include personal information in the content you Bleat or post publicly. You can reduce the risk of being personally identified by using the Service pseudonymously, though doing so could detract from the credibility of your contributions to the Service.

### **DATA RETENTION & ACCOUNT TERMINATION**

You can close your account at any time. We will remove your public posts from view and/or dissociate them from your account profile, but we may retain information about you for the purposes authorized under this Privacy Policy unless prohibited by law. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Service or to comply with legal obligations. Please note that businesses cannot remove their business listings, ratings, or reviews by closing their accounts.

### **CHILDREN**

The Service is intended for general audiences and is not directed to children under 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information without parental consent, please contact immediately. If we become aware that a child under 13 has provided us with personal information without parental consent, we take steps to remove such information and terminate the child's account.

### **SECURITY**

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet or via mobile device, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

### **CONTACT INFORMATION**

If you believe that iBleat has not adhered to this Privacy Policy, you may contact us online by visiting [www.ibleat.com](http://www.ibleat.com)

### **INTERNATIONAL DATA TRANSFER**

For users residing in the European Union, please note that the personal data information we obtain from or about you may be transferred, processed and stored outside of the E.U. for the purposes described in this Privacy Policy, including in the United States of America. We take the privacy of our users seriously and therefore take steps to safeguard your information, including assuring an adequate level of data protection in accordance with E.U. standards.

## **MODIFICATIONS TO THIS PRIVACY POLICY**

We may revise this Privacy Policy from time to time. The most current version of the Privacy Policy will govern our collection, use, and disclosure of information about you. If we make material changes to this Privacy Policy, we will notify you by email or by posting a notice on the Service prior to the effective date of the changes. By continuing to access or use the Service after those changes become effective, you agree to the revised Privacy Policy.

### **CALIFORNIA RESIDENTS: YOUR CALIFORNIA PRIVACY RIGHTS**

iBleat does not disclose your personal information to third parties for the purpose of directly marketing their services to you unless you first agree to such disclosure. If you have any questions regarding this policy, or would like to change your preferences, you may contact us at [www.ibleat.com](http://www.ibleat.com)