

Parley Privacy Policy

Effective Date: 12/7/2020

Parley LLC and its affiliates (collectively, “**Parley**,” “**we**,” or “**us**”) is committed to protecting the privacy and security of the information we collect and to being transparent about the ways in which we collect and process your information. This statement (the “**Privacy Policy**”) sets forth our policies and practices for handling the information we collect from or about you. It applies to the app and other services that we operate and that link to this Privacy Policy (the “**Services**”).

I. COLLECTION OF INFORMATION

We collect the following categories of information when you use our Services:

- Information you provide to us directly or through your engagement.
 - **Contact and Sign-In Information**, including name, email address, phone number, address, and username and password;
 - **Profile Information**, including your interests, professional information, employment, date of birth, photograph, avatar, and location;
 - **Services Engagement**, including comments, course completion, mission status and history, event description and details, level, friend connections and groups, and experience points;
 - **Commercial information**, including records of products or services purchased or obtained, or other purchasing or consuming histories;
 - **Device and geolocation data**, such as when you scan a QR code or NFC chip. Consistent with your device or app permissions, we also collect geolocation information derived from your GPS, WiFi, and Bluetooth signals to provide you with location-enabled features, such as validating your completed mission or suggesting missions near you. We also may collect other information from your device consistent with your device or app permissions to provide you with certain features or functionality.
 - **Transaction and Billing Data**, including payment card details (credit card number, expiration date, and credit card security code, where needed to complete a transaction), billing address, delivery address, and transaction history; and
 - **Correspondence you send to us or through the Services and other information you provide**, including pledges that you make through the Services, messages that you send through the Services, images you post on the Services, petitions that you sign through the Services, reports you provide of an environmental issue, and information you post about personal or group missions.

- ***Information we collect automatically.*** We collect internet, electronic activity, and other information automatically from the devices and browsers that you use, including your device type; Internet protocol (IP) address; device and advertising identifiers; browser type and version; operating system and platform; Internet service provider; the date and time of your visit; information about the links you click, pages you view, and advertising you interact with within the Services and other information about how you use the Services; the technology on the devices you use to access these Services; and standard server log information. If you or your device experiences an error, we collect information about the error, the time the error occurred, the feature being used, the state of the application when the error occurred, and any communications or content provided at the time the error occurred.

We also receive information about you from other sources, including from other users of our Services, and third-party services and organizations. For example, if you access any social media or similar services through the Services to login, we may collect information from these third-party services. If you purchase items from us or our partners, we may receive information about your history and characteristics from those partners and sources that process your payment. Please note that information collected by these third parties is subject to their own privacy policies.

Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information.

We may aggregate or de-identify the information described above. Aggregated or de-identified data is not subject to this Privacy Policy.

II. USE OF INFORMATION AND PURPOSE OF DATA PROCESSING

We use and otherwise process each of the categories of information identified above for the following business purposes:

Purpose/Activity	EEA/UK lawful basis for processing, including basis of legitimate interest
To provide you with the information, products and services that you request from us; to allow you to participate in missions and other features of our Services; to manage your membership and account; and to notify you about changes to our terms or privacy policy.	(a) Performance of a contract with you (b) Necessity to comply with a legal obligation (c) Necessity for our legitimate interests (for instance, to keep our records updated)
To communicate with you, include to make suggestions and recommendations to you, or to send promotional materials from us or by our affiliates and trusted business partners.	Necessity for our legitimate interests (to grow our business)
To improve our Services and to ensure that	(a) Necessity for our legitimate interests (for

content is presented in the most relevant and effective manner for you and for your device; to administer our Services, including troubleshooting, data analytics, testing, research, statistical and survey purposes; to keep our Services, business and users safe and secure; to comply with applicable laws and regulations; and to protect or exercise our legal rights or defend against legal claims.

running and protecting our business; for provision of administration and IT services; for network security and to prevent cybercrime and fraud; in the context of a business reorganisation or group restructuring exercise; to study how people use our Services, to develop the Services, to keep our Services updated and relevant, to grow our business and to inform our communications strategy)

(b) Necessity to comply with a legal obligation

(c) Performance of a contract with you

Where legally required and we have no other valid legal basis to process your information, we will obtain consent, which may subsequently be withdrawn at any time by [contacting us](#). Withdrawing consent does not affect the lawfulness of processing based on consent before it is withdrawn.

III. DISCLOSURE OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

- Authorized third-party vendors and service providers. We share your information with third-party vendors and service providers that provide services to us for a variety of business purposes, such as payment processing, customer service, email deployment, advertising and marketing, security and performance monitoring, maintaining or servicing accounts, and processing or fulfilling orders and transactions. These third parties collect, use, and access your data to perform their functions, and we may allow them to use information about you for their own purposes in accordance with applicable law.
- When you use services or features operated by third parties. In some cases, we work with third parties to provide certain services or features that are available through the Services. For example, the Parley Shop is operated by Shopify, and Eventbrite manages our event management features. As another example, third parties such as SoundCloud, Spotify, and YouTube may host and provide embedded video that is accessible through the Services. Please note that these third parties may process your data in accordance with their own policies and may supplement the data collected or received in connection with the Services with data they collect or receive through other websites, platforms, and services, in accordance with the policies and disclosures posted on those websites, platforms, and services.
- Corporate affiliates. We may share your information with our corporate affiliates.

- Business transfers. We may share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, initial public offering, or in the unlikely event of bankruptcy.
- Legal purposes. We may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of Parley, our affiliates, users, or the public.

With your consent or direction. We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent or direction. For example, we may partner with third parties to allow you to use points accrued through the Services for third-party benefits or services. In order to do that, we may make available information about your point accrual and engagement with the Services. If you access third-party services -- such as social media services or purchasing platforms -- through the Services, these third-party services may be able to collect information about you in accordance with their own privacy policies.

If you choose to engage in public activities on the Services, you should be aware that any information you share there can be read, collected, or used by other users of these areas. You should use caution in disclosing information while participating in these areas. We are not responsible for the information you choose to submit in these public areas.

IV. ADVERTISING, COOKIES AND SIMILAR TECHNOLOGIES

When you use our Services, we and our third party advertising partners (including data analytics providers, operating systems and platforms, and social networks) use cookies, pixel tags, local storage, mobile advertising IDs, and other similar technologies (collectively, “cookies”) to collect information from your browser or device, including but not limited to provide analytics and advertising on our Service and elsewhere based on users’ online activities over time and across different sites, services, and devices. By using the Services, you consent to our use of cookies and similar technologies.

The following types of cookies are used on our Services:

- Essential cookies – These cookies enable you to use our Services. These cookies are essential to enable you to browse our Services and use certain features. Disabling them may prevent you from using certain parts of the Services. Without these cookies, certain services cannot be provided. These cookies also help keep our Services safe and secure.
- Preference cookies – These cookies store information such as your preferred country and language selection, login data and website preferences. Without these cookies, our Services may not be able to remember certain choices you've previously made (such as a saved country / language preference) or personalize your browsing experience by providing you with relevant information. These cookies can also be used to recognize your device so that you do not have to provide the same information more than once.
- Performance cookies – These cookies collect information about how you use our Services such as which pages you visit regularly. These cookies are used to provide you

with a high-quality experience by doing things such as tracking page load, site response times, and error messages.

- Content / advertising cookies – These cookies gather information about your use of our Services so we may improve your experience and provide you with more relevant content and advertising on our Services and elsewhere online and across your devices. They are also used to gather feedback on customer satisfaction through surveys. They remember that you've visited our Services and help us understand usage of our Services.

Do-Not-Track Signals and Similar Mechanisms. Some mobile and web browsers transmit "do-not-track" signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals

V. YOUR RIGHTS AND CHOICES

You may be entitled, in accordance with applicable law, to object to or request restriction of processing of your information, and to request access to, rectification, erasure, and portability of your information or more information about our information practices. Requests should be submitted in writing as set out [below](#). If you become aware of changes or inaccuracies in your information, you should inform us of such changes so that the information may be updated or corrected. We may verify your request, such as by requesting additional information from you. You may be entitled, in accordance with applicable law, to submit a request through an authorized agent.

Parley does not treat the sharing of your personal information as described in this Privacy Policy as a "sale" of your information, but you nonetheless have choices about collection of information about your use of our Services through cookies and other tracking technologies, including by third parties whose privacy practices we cannot control. For example, you may also be able to limit certain interest-based mobile advertising or reset your mobile advertising ID through the settings on your mobile device. In addition, you may be able to refuse or disable cookies by adjusting your web browser settings. Some browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. Because each web browser is different, please consult the instructions provided by your web browser (typically in the "help" section). Please note that you may need to take additional steps to refuse or disable Local Shared Objects and similar technologies. For example, Local Shared Objects can be controlled through the instructions on Adobe's [Setting Manager page](#). If you choose to refuse, disable, or delete these technologies, some of the functionality of the Services may no longer be available to you and any differences in service are related to the data. Deleting cookies may in some cases cancel the opt out selection in your browser.

Some of our third-party partners are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please click [here](#) or [here](#). For additional information on how Google processes your information and what choices you may have, visit their site [here](#). Due to

differences between websites and mobile apps, you may need to take additional steps to opt out of interest based advertising for mobile applications. Please check your device settings and mobile app permissions for additional information on how to opt out. You also may stop further data collection from a mobile application by removing it from your mobile device.

You also may be able to control our collection and use of your location information through your mobile device or app settings.

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on the Service may change or no longer be available to you.

You may lodge a complaint with a relevant data privacy authority if you believe our processing of your information is unlawful.

VI. INTERNATIONAL TRANSFERS

By using the Services and providing us with information, you understand that your information is being collected and stored on, and may be transferred to, servers located outside your resident jurisdiction. We and many of our third-party vendors are based in the United States, and your information is being processed by us in the United States and other jurisdictions where laws may not be equivalent to those where you reside. To the extent we disclose your information to third-party vendors, we use contractual safeguards to help ensure that such third-party vendors are bound to duties of confidentiality. Where local law permits, you are deemed to have consented to these data transfer practices through your use of the Services. If you do not consent to these data transfer practices, please do not use the Services.

VII. CHILDREN

We do not knowingly collect or sell any information from children, as defined by applicable law, without parental consent or as otherwise permitted by applicable law.

VIII. DATA RETENTION, SECURITY, AND INTEGRITY

Information will be retained only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

We maintain security measures to safeguard information from loss, theft interference, misuse, unauthorized access, disclosure, alteration, or destruction. However, you should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure, accurate, complete, or current. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

IX. CHANGES TO THE PRIVACY POLICY

We may modify this Privacy Policy from time to time. When we update the Privacy Policy, we will revise the "Effective Date" date above and post the new Privacy Policy. We recommend

that you review the Privacy Policy each time you visit the Services to stay informed of our privacy practices.

X. CONTACT INFORMATION

If you have any questions about this Privacy Policy or our practices, please contact us via support@parley.tv