

FRIENDTOO LLC

Privacy Policy

Effective on July 21, 2024

This Privacy Policy describes the information we collect, why we collect it, and how it may be used. It also describes some choices and control you have over your personal information. This policy applies to any information we collect on or through our website. You must agree to the provisions of this Privacy Policy to use our website. We refer to our website as our “**platform**”.

This Privacy Policy is incorporated by reference into, and is a part of, our Terms of Use Agreement, which you can access here: [**INSERT LINK**].

Information we may collect

Personal Information

To use the products and services we make available on our Platform from time to time (which we collectively refer to as our “**services**”), we may collect information that could personally identify you or that is linked, or is reasonably linkable, to you. We refer to this information as “**personal information**”. Examples of personal information are your:

- first and last name,
- phone number,
- full mailing address,
- email address,
- communications with users through the platform that are not posted on publicly accessible portions of the platform,
- credit card or bank account information,
- health information, and
- geolocation data that precisely identifies your location in real time and for a reasonable time thereafter.

Non-Personal Information

We may also collect information on or through our platform that does not, by itself, personally identify you or is not linkable to you. We identify this information as “**non-personal information**” in this Privacy Policy.

We treat any personal information that you make publicly available as non-personal information to extent allowed by law. We treat personal information that has been de-identified, such as in hashed, non-human readable form (“**anonymized**”), as non-personal information.

Examples of this information are your:

- age,
- gender,
- interests,
- content you post on publicly accessible pages of the platform (including pictures or videos),
- other demographic information, and
- information collected from your activities on the platform as described below.

Sensitive Information

If you provide us with information about your racial or ethnic origin, religious beliefs, health diagnosis, sexual orientation, or citizenship or immigration status, you consent to us using it for the purposes identified in this Privacy Policy. We treat sensitive information that has been anonymized as non-personal information.

Other Information

We use and may allow others to use cookies and similar technologies (e.g., web beacons, pixels) to recognize you and/or your device(s) and to collect information about your activity on our platform. We may use them for purposes of authenticating you, remembering your preferences and settings, analyzing site traffic and trends, delivering and measuring the effectiveness of advertising campaigns, and allowing you to use features.

We collect information about which features you've used, your viewing and interaction on the platform, how you've used them, your search and browsing activity, and the devices you use to access our services. For example, we may collect information relating to your activity on our website or apps, pages you visit, what you click on while visiting, and your other interactions with our sites. We also collect information from and about the device you use to access our services, including:

- hardware and software information such as IP address, device ID and type and service provider,
- device-specific and apps settings and characteristics,
- browser type, version and language,
- operating system,
- time zones, and
- identifiers associated with cookies or other technologies that may uniquely identify your device or browser.

If you give us permission, we may collect your precise geolocation (latitude and longitude) through various means, depending on the service and device you're using, including GPS, Bluetooth or Wi-Fi connections. The collection of your geolocation may occur in the background even when you aren't using the services if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will

not collect it. We treat real-time, precise information as personal information. We treat historical or non-precise information as non-personal information.

How we may use this information

We will use personal information only for the purposes explained in this Privacy Policy. We may use non-personal information for any of the purposes explained in this Privacy Policy, as well as for any other legitimate business purposes to the extent permitted by law.

To provide our services to you

We use personal information to provide our services, including to:

- provide you with customer support and responding to your requests.
- complete your transactions.
- administer sweepstakes, contests, discounts or other offers.
- develop, display and track content and advertising tailored to your interests on our services and other sites.
- communicate with you by email, phone, social media or mobile device about products or services that we think may interest you, or for order management and billing purposes.

To improve our services

We use personal information to:

- conduct research and analysis in order to review, assess, improve or expand our services.
- prevent, detect and fight fraud or other illegal or unauthorized activities.
- address ongoing or alleged misbehavior on and off-platform.
- act under exigent circumstances to protect the personal safety of our users or the public.

To ensure legal compliance

We may use personal information to comply with legal requirements, assist law enforcement and enforce or exercise our rights.

Sharing Information with Third Parties

Third party vendors and partners

We use third parties to help us operate and improve our services. These third parties may assist us with various tasks, such as data hosting and maintenance, analytics, customer care, marketing, advertising, payment processing and security operations. We may also partner with third parties to perform research in areas related to our services and mission.

We will only share personal information with third party vendors who agree to keep such information confidential and only use such information to perform services for us.

When required or allowed by law

We may share personal information with third parties to:

- comply with a legal process, such as when required by a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirement;
- assist in the prevention or detection of crime (when allowed by law); or
- to protect the safety of any person.

To enforce legal rights

We may share personal information:

- if disclosure could mitigate our liability in an actual or threatened lawsuit;
- as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties;
- to enforce our agreements with you; or
- to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

For corporate transactions

We may transfer your personal information to a successor to all or a portion of our business if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

With your consent or at your request

We may ask for your consent to share your personal information with third parties in other circumstances.

Non-personal information and anonymized information

We may share non-personal information with third parties to the extent allowed by law. This includes sharing such information

- under any of the circumstances described above, and
- with third parties for research purposes or to deliver, analyze and report on advertising you see.

We may combine this information with additional non-personal information or personal information in hashed, non-human readable form collected from other sources.

Options and rights

You have the following options and tools available to you:

- *Personal information in your account.* You may access, confirm or remove personal information that you provided to us and is associated with any account or profile you create.
- *Device permissions.* You can change your settings on your devices to grant or withhold permission for us to collect specific types of device data and notifications, such as phone contacts, pictures, location services, push notifications and advertising identifiers. If you do this, certain services may lose functionality.

You have the following rights:

- *Access.* You may have the right to request a copy of the personal information we keep about you. To do so, please contact us as noted below.
- *Delete/erase.* You may request that we delete the personal information we keep about you. You can exercise your right to delete by submitting a request to us.
- *Correct/rectify/update.* You can correct personal information you provided to us by editing your profile directly in the service. If you believe the information we hold about you is inaccurate, you may contact us to confirm this and/or rectify it.

We may reject requests if we are unable to authenticate you, if the request is unlawful or invalid, or if it may infringe on trade secrets or intellectual property or the privacy or other rights of someone else. Also, we may not be able to accommodate certain requests to object to or restrict the processing of personal information if you desire to use our services and such requests would not allow us to provide such service.

If we deny your privacy request, you may be able to appeal by contacting us and explicitly referencing “Privacy Request Appeal.” If you have concerns about the result of your appeal you may contact the attorney general for your state.

Please note that we do not “sell” your personal information or use it for “targeted advertising” or “profiling” in furtherance of decisions that produce legal or similarly significant effects, as those terms are defined by applicable law, so no opt-out choice is necessary.

How we protect and retain your information

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your information. As with all technology companies, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure or safe from unauthorized access and use.

Our platform may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personal information.

We keep your personal information only as long as we need it for legitimate business purposes and as permitted by applicable law. This includes retention of information for tax and accounting legal requirements, for financial transaction recording, for customer care records to defend us in the event of a future claim, and when required by law or for outstanding or potential claims.

We may keep non-personal information as long as permitted by applicable law.

Important Notice to Non-U.S. Residents

Our platform and servers are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us maybe transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use any of our website and/or platform, you consent to any transfer and processing of your personal information in accordance with this Privacy Policy and you do so at your own risk.

Notice to California Residents

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact us via email at support@friendtoo.com.

Children Under Thirteen

We do not knowingly collect personal information from children under the age of thirteen. If you are under the age of thirteen, you may not use our platform.

Changes to this Statement

We may change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, or by placing a prominent notice on our site.

How to contact us

If you need to send us any privacy requests or notices, or have questions about this Privacy Policy, here's how you can reach us:

FriendToo LLC
336 East University Parkway #1170
Orem Utah 84058

Email Address:
support@friendtoo.com