# ScopeChat's privacy policy

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Welcome to ScopeChat -- the local social app where you can tell a secret to ONE or MANY in your defined radius and it is still considered a secret because no one knows who told the secret, developed by Adaptive Schemer LLC. ("ScopeChat," "we," "us" or "our").

This privacy policy explains how we collect, use and disclose information about you when you use our mobile application (the "App"), our Web site (the "Site") and other online products and services that link to this privacy policy (collectively, the "Service"). By using the Service, you consent to our collection, use and disclosure of your personal information as described in this privacy policy.

Through the Service, you can anonymously share messages, pictures, videos, comments and other content ("Posts") with other users of the Service. You may also send private messages directly to another user ("PrivPosts"). When you share a Post through the App, you are anonymously sharing your Post with users within a radius (the "Radius") you have selected for your mobile device, these users (your "Radiuses") are also registered with our Service. You can send and receive Not Safe For Work messages (the "NSFW") or you can choose not to receive NSFW Posts at anytime you desire. Through the Service you may block Posts from any user within your Radius simple by pressing the strikethrough circle "Block / Report This User" button (lower right hand corner of the message).

For more information about the Service, please see our <u>FAQ page</u>.

## Modifications

We may change this privacy policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we will provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). We encourage you to review the privacy policy periodically to stay informed about our practices and the ways you can help protect your privacy.

## Collection of Information

# Information You Provide to Us

We collect information you directly give us. For example, we collect information about you when you sign up for our Service, make a Post, send a Message, give feedback about the Service or otherwise communicate with us. The types of information we may collect include your email address, your mobile phone number and any other information you choose to provide. For information as to how to restrict the collection of contact information, please see the "Your Choices" section below. If you choose not to provide certain information, we may not be able to provide the Service to you or certain features of the Service may be unavailable or work differently.

Information We Collect Automatically When You Use the Service

When you access or use our Service, we automatically collect certain information about you. This information includes:

- " Log Information: We log information about your use of the Service, including the type of device you use, access times, location information, Posts and pages viewed. We use this information for analytic and product improvement purposes.
- " Device Information: We collect information about the mobile device you use to access our Service, including the hardware model, operating system and version, unique device identifiers and mobile network information. We use this information for analytic and product improvement purposes.
- " Location Information: We collect information about the location of your Internet Service Provider based on your IP Address. If you allow ScopeChat to access your location information, we collect your geolocation information. We use this information to show you Posts from users in your Radius and to show your Posts to users in your Radius. For information as to how to restrict the collection of geolocation information, please see the "Your Choices" section below.
- " Information Collected by Cookies and Other Tracking Technologies: We use various technologies to collect information, and this may include cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory. Web beacons (also known as "tracking pixels") are non-visible electronic images. These technologies are used for analytic and product improvement purposes, such as seeing which areas and features of our Service are popular and determining whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Your Choices" below.

# Use of Information

We may use information about you for various purposes, including to:

- " Provide, deliver, maintain, test and improve our Service;
- " Send you technical notices, updates, confirmations, security alerts and support and administrative messages;
- " Respond to your comments, questions and requests and provide customer service;
- " Communicate with you about products, services, offers, promotions, rewards and events offered by us and others, and provide news and information we think will be of interest to you;
- " Monitor and analyze trends, usage and activities in connection with our Service and improve and personalize the Service;
- " Detect, investigate and prevent any suspected breaches of our Terms of Service/EULA; and

" Link or combine with information we get from others to help understand your needs and provide you with better service.

# Storage of Information

The information you provide to ScopeChat is encrypted and stored on servers operated by our internet connect affiliate. We take reasonable measures to protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction, but we cannot guarantee that our system is infallible. The information we collect and store is only what is needed to provide the Service and as such it is the lease intrusive we have seen to this point on the internet.

We seek to minimize the data we keep because we do not want to keep your data. Your information is stored only as long as necessary to accomplish the purposes described in this privacy policy. Your account is effectively deleted whenever you change your logon email or you may delete your account at any time by emailing <a href="legaloffice@scopechat.com">legaloffice@scopechat.com</a>. Your information will typically be deleted from our system within nine (9) days which we are working to reduce to four (4) days. However, Google and other service providers that we may use to store information may have their own data backup and retention policies. Though we will not have access to your information after it is deleted from our system, it may take longer for your information to be completely removed from our service providers and content delivery networks. You should also understand that users who see your messages can always save them, either by taking a screenshot or by using some other image-capture technology (whether that be software or even a camera to take a photo of your device's screen).

# Sharing of Information

\*We urge all users of ScopeChat and the internet to be cautious of whom they trust and also to be extremely aware and careful of what they share directly or indirectly.\*

We may share aggregated, de-identified or non-personal information about you as follows or as otherwise described in this privacy policy:

" With other users of the Service (including some whom may not be your Radiuses) by providing them with your secret Posts and Messages and your general location (if you have enabled us to collect your location).

We may also share information (which may at times include personal information) about you as follows:

- " With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
- " In connection with, or during negotiations of, any merger, sale of ScopeChat's assets, financing or acquisition of all or a portion of our business to another company;

- " In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;
- " If the content of a Post can reasonably be considered illegal or unlawful (or we have a good faith belief that the Post is being used to engage in, encourage or promote such activities), in which case we may share your identity and other information with proper authorities;
- " If we believe that doing so is reasonably necessary or appropriate in order to protect the rights, property and safety of ScopeChat, our users and/or others; and
- " With your consent or at your direction, including if we notify you through our Service that the information you provide will be shared in a particular manner and you provide such information.

Note that if you choose to include information about you in your Posts or Messages, such information will be shared with other users of the Service who receive such Posts or Messages as described in this privacy policy. We suggest that you do not include any identifiable information about you in your Posts or Messages. Also, please note that if you or other users choose to share a Post through a third party, such as Facebook, Twitter or an email client, any further collection and sharing of that Post by such third party or its users will be governed by that third party's privacy policy, and we cannot control what any third party does with any Posts or other information that is shared with third parties.

# How We Respond to Subpoenas from Courts

If a court asks us to disclose your identity, we may be compelled to do so to the extent possible. If we receive a subpoena or court order requesting that we disclose your information, we will attempt to contact you, if feasible, before we disclose any information to give you time to fight the subpoena in court. In the United States, for example, you may be able to fight the subpoena on the basis that it violates your First Amendment right to speak anonymously.

#### International Users

ScopeChat is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Service or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries. Information shared in accordance with this privacy policy may be disclosed to overseas recipients located in the United States, Canada, the European Union, Australia and New Zealand and other countries. This may include disclosures to overseas recipients outside of the European Economic Area, including countries that do not have laws that protect personal information in the same manner as countries within the European Economic Area.

ScopeChat currently do not but may in the future participate in the EU-U.S. and Swiss-U.S. Privacy Shield, and would then adhere to the EU-U.S. and Swiss-U.S. Privacy Shield Privacy Principles regarding the collection, use, and retention of personal information from European Union member countries and

Switzerland. For internal transfers, we would rely on Model Contractual Clauses or the EU-U.S. and Swiss-U.S. Privacy Shield, which you can read more about <u>here</u>.

# **Analytics Services Provided by Others**

We may allow third parties to provide analytics services to us. These entities may use cookies, web beacons and other technologies to collect information about your use of the Service, including your IP address, Posts, Posts viewed, time spent on Posts, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content and better understand your online activity to improve the Service.

## **Your Choices**

#### Account Information

If you wish to delete your account, follow the instructions on our <u>FAQ page</u>. Note that we may retain certain information as required by law or for legitimate business purposes as may be necessary to fulfill the purposes identified in the privacy policy. We may also retain cached or archived copies of information about you for a certain period of time.

### Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your web browser to remove or reject browser cookies. Removing or rejecting browser cookies does not necessarily affect third party flash cookies used in connection with the Service. To delete or disable flash cookies please visit www.adobe.com/products/flashplayer/security for more information. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Service.

## **Push Notifications and Alerts**

With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device. Please keep in mind that this could affect the availability and functionality of the Service.

# **Geolocation Information**

You can restrict ScopeChat's collection of geolocation information by changing your phone's privacy settings. Please keep in mind that this could affect the availability and functionality of the Service.

## Contact Us

If you have any questions or concerns about this privacy policy or any privacy issues, please email our Privacy Manager at <a href="mailto:legaloffice@scopechat.com">legaloffice@scopechat.com</a> Our Privacy Manager is responsible for coordinating the investigation of any concerns or complaints made to ScopeChat about privacy issues and resolving the

matter with a complainant. If you email our Privacy Manager at the email specified above, we will respond to concerns and complaints within a reasonable time after receipt (usually no more than 15 business days).