# **Privacy Policy**

Welcome to our Privacy Policy. Thank you for taking the time to read it.

We appreciate that you trust us with your information, and we intend to always keep that trust. This starts with making sure you understand the information we collect, why we collect it, how it is used and your choices regarding your information.

#### 1. Who we are

We are a couple of individuals who want to bring like minded people closer. If you want to contact us, you can do so by dropping an email to rizzpvtltd@gmail.com.

# 2. Where This Privacy Policy Applies

This Privacy Policy applies to our apps on Android and iOS platforms. For simplicity, we refer to these as our "services" in this Privacy Policy.

#### 3. Information We Collect

We and the people on our App who are looking to connect with other people need to know the basics of your information and the types of people you'd like to meet. We also collect information about your use of our services such as access logs, as well as information from third parties, like when you access our services through your social media account or when you upload information from your social media account to complete your profile.

#### Information you give us

You choose to give us certain information when using our services. This includes:

When you create an account, you provide us with your email address, as
 well as some basic details necessary for the service to work, such as your

- gender, age, photos, a little something to go into your bio and who you'd like to connect with.
- To add certain content, like pictures, you may allow us to access your camera and photo album.
- When you participate in surveys, focus groups or market studies, you give
  us your insights into our products and services, responses to our questions
  and testimonials.
- If you contact our customer care team, we collect the information you give us during the interaction.
- Of course, we also process your chats with other members, as well as the content you publish, to operate and secure the services, and to keep our community safe.

#### Information we receive from others

In addition to the information you may provide us directly, we receive information about you from others, including:

- Social media You may decide to share information with us through your social media account, for instance if you decide to create and log in to your Rizz account via your social media or other account (e.g. Facebook, Google).
- Other partners: We may receive information about you from our partners where our ads are published on a partner's service (in which case they may pass along details on a campaign's success).

#### Information generated or automatically collected when you use our services

When you use our services, this generates technical data about which features you've used, how you've used them and the devices you use to access our services. See below for more details.

- **Usage information:** Using the services generates data about your activity on our services, for instance how you use them (e.g. when you logged in, features you've been using, actions taken, information shown to you, referring webpages address and ads that you interacted with) and your interactions with other members (e.g. members you connect and interact with, and when you matched and exchanged messages with them).
- Device information: We collect information from and about the device(s) you use to access our services, including hardware and software information such as IP address, device ID and type, app settings and characteristics, app crashes, advertising IDs (which are randomly generated numbers that you can reset by going into your device settings and, in some cases, disable entirely), and identifiers associated with cookies or other technologies that may uniquely identify a device or browser.
- Information collected by cookies and similar technologies: We use
  and may allow others to use cookies and similar technologies (e.g. web
  beacons, pixels, SDKs) to recognise you and/or your device(s). You may
  read our <u>Cookie Policy</u> for more information on why we use them and how
  you can better control their use.
  - Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) have a 'Do Not Track' ('DNT') feature which tells a website that a user does not want to have their online activity tracked. If a website that responds to a DNT signal receives a DNT signal, the browser can block that website from collecting certain information about the browser's user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many businesses, including ours, do not currently respond to DNT signals.
- Other information:

Your city: We need to know your city so that you are matched with the people who are in the same city. We currently do not ask for geolocation permission, it depends on you only which city you choose. But you can't edit it later.

#### 4. How We Use Information

The main reason we use your information is to deliver and improve our services. Additionally, we use your info to help keep you and our community safe, and to provide you with advertising that may be of interest to you.

#### A. To administer your account and provide our services to you

- Create and manage your account
- Provide you with customer support and respond to your requests
- Communicate with you about our services

#### B. To help you connect with other users

- Recommend you to other members and recommend other members to you
- Show members' profiles to one another
- Enable members to search for and connect with other members
- Let members start a chat with you or let you to start a chat with them

## C. To provide new Rizz services to you

- Register you and display your profile on new Rizz features and apps
- Administer your account on these new features and apps

#### D. To provide offers and operate advertising and marketing campaigns

- Perform and measure the effectiveness of advertising campaigns on our services and marketing our services off our platform
- Communicate with you about products or services that we believe may interest you

#### E. To improve our services and develop new ones

- Administer focus groups, market studies and surveys
- Review interactions with customer care teams to improve our quality of service
- Understand how members typically use the services to improve them (for instance, we may decide to change the look and feel or even substantially modify a given feature based on how members react to it)
- Develop new features and services (for example, we may decide to build a new interests-based feature further to requests received from members)

#### F. To prevent, detect and fight fraud and other illegal or unauthorised activities

- Find and address ongoing, suspected or alleged violations of our <u>Terms of</u>
   <u>Use</u>, notably through the review of reports and interactions between
   members
- Better understand and design countermeasures against violations of our Terms of Use
- Retain data related to violations of our <u>Terms of Use</u> to address the violation and prevent against recurrences
- Enforce or exercise our rights, for example our rights set out in our <u>Terms</u>
   of Use
- Communicate to individuals who submit a report, including what we've done as a result of their submission

#### G. To ensure legal compliance

- Comply with legal requirements
- Assist law enforcement

For information on how we process personal information through profiling and automated decision-making.

To process your information as described in this Privacy Policy, we rely on the following legal bases:

- Provide our service to you: The reason we process your information for purposes A, B and C above is to perform the contract that you have with us. For instance, as you go about using our service to build meaningful connections, we use your information to maintain your account and your profile, make it viewable to other members and recommend other members to you, and to otherwise provide our free and paid features to you and other members.
- Legitimate interests: We process your information for purposes D, E and F above, based on our legitimate interest. For instance, we analyse users' behaviour on our services to continuously improve our offerings, we suggest offers we think might interest you and promote our own services, we process information to help keep our members safe, and we process data where necessary to enforce our rights, assist law enforcement and enable us to defend ourselves in the event of a legal action.
- Comply with applicable laws and regulations: We process your information
  for purpose G above where it is necessary for us to comply with applicable
  laws and regulations and evidence our compliance with applicable laws
  and regulations. For example, we retain traffic data and data about
  transactions in line with our accounting, tax and other statutory data
  retention obligations and to be able to respond to valid access requests
  from law enforcement.
- Consent: From time to time, we may ask for your consent to collect specific information such as your precise camera or use your information for certain specific reasons. In some cases, you may withdraw your consent by adapting your settings. In any case, you may withdraw your consent at any time by contacting us at the email address provided at the end of this Privacy Policy.

#### 5. How we share information

Since our goal is to help you make meaningful connections, the main sharing of members' information is, of course, with other members. We also share some types of member information with service providers and partners who assist us in operating the services. Read on for more details about how your information is shared with others.

#### With other members

You share information with other members when you disclose information on the service. Please be careful with your information, and make sure that the content you share are things you're comfortable with being visible. If someone submits a report involving you (such as a claim you violated our <a href="Terms of Use">Terms of Use</a>), we may communicate to the reporter actions, if any, we took as a result of their report.

## With our service providers and partners

We use vendors to help us develop, operate, distribute, market and improve our services, such as data hosting and maintenance, analytics, customer care, marketing, advertising, payment processing and security operations. We also share information with vendors who distribute and assist us in advertising our services. For instance, we may share limited information on you in hashed, non-human readable form to advertising vendors.

# • For corporate transactions

We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganisation, dissolution, bankruptcy or other change of ownership or control.

# With law enforcement/when required by law

We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant,

government/law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

## • To enforce legal rights

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and the legal rights of our members, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing.

## With your consent or at your request

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information. We may use and share non-personal information (meaning information that, by itself, does not identify who you are such as device information, general demographics, general behavioural data, location in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above circumstances. We may also share this information with third parties (notably advertisers) to develop and deliver targeted advertising on our services and on websites or applications of third parties, and to analyse 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.

# 6. Your rights and choices

We want you to be in control of your information, so we want to remind you of the following options and tools available to you:

- Access/update tools in the service. Tools and account settings can help
  you access, rectify or remove information that you provided to us and that's
  associated with your account directly within the service. If you have any
  questions on those tools and settings, please contact our customer care
  team for help at rizzpctltd@gmail.com.
- Device permissions. Mobile platforms can have permission systems for specific types of device data and notifications, such as pictures, push notifications and advertising identifiers. You can change your settings on your device to either consent or oppose the collection or processing of the corresponding information or the display of the corresponding notifications.
   Of course, if you do that, certain services may lose functionality.
- Uninstall. You can stop all information collection by the app by uninstalling
  it using the standard uninstall process for your device. Remember that
  uninstalling an app does NOT close your account. To close your account,
  please use the corresponding functionality on the service.
- Account deletion. You can close your account by using the corresponding functionality directly on the service.

We also want you to be aware of your privacy rights. Depending on where you live, you may have the right to:

- **Delete.** 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 our email id.
- Correct/rectify/update. You can correct some 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 rectify
  it.

For your protection and the protection of all of our members, we may ask you to provide proof of identity before we can answer the above requests. Keep in mind,

we may reject requests, including 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. If you wish to receive information relating to another member, such as a copy of any messages you received from them through our service, the other member will have to contact us to provide their written consent before the information is released. We may also ask them to provide proof of identity before we can answer the request. We may also not be able to accommodate certain requests to object to or restrict the processing of personal information, notably where such requests would not allow us to provide our service to you anymore.

# 7. How long we retain your information

We keep your personal information only as long as we need it for legitimate business purposes (as laid out in Section 4) and as permitted by applicable law. If you decide to stop using our services, you can close your account and your profile will stop being visible to other members. After your account is closed, we will delete your personal information, as laid out below:

- 1. We delete your data immediately you request it from the app or via email, and only keep limited information for specified purposes, as laid out below:
  - a) We maintain limited information on the basis of our legitimate interest: we keep customer care records and supporting data as well as imprecise location of download/purchase for five years to support our customer care decisions, enforce our rights, and enable us to defend ourselves in the event of a claim, information on the existence of past accounts and subscriptions, which we delete three years after the closure of your last account to ensure proper and accurate financial forecasting and reporting, profile data for one year in anticipation of potential litigation, for the establishment, exercise or defense of legal claims, and data necessary to prevent members

- who were banned from opening a new account, for as long as necessary to ensure the safety and vital interests of our members.
- b) Finally, we maintain information on the basis of our legitimate interest where there is an outstanding or potential issue, claim or dispute requiring us to keep information (in particular if we receive a valid legal subpoena or request asking us to preserve data (in which case we would need to keep the data to comply with our legal obligations) or if data would otherwise be necessary as part of legal proceedings).

## 9. Age restriction

Our services are restricted to individuals who are 18 years of age or older. We do not permit individuals under the age of 18 on our platform.

# 11. Privacy Policy changes

Because we're always looking for new and innovative ways to help you build meaningful connections and strive to make sure explanations about our data practices remain up to date, this policy may change over time. We will notify you before any material changes take effect so that you have time to review the changes.

#### 12. How to contact us

If you have questions about this Privacy Policy, you can send an email here: rizzpvtltd@gmail.com