

This Privacy Policy explains how we (Owls.) collect, use and share your information when you use our website, mobile application and other online products and services (we call all these the "Services") or when you otherwise interact with us.

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy or providing you with additional notice (such as adding a statement to our homepage or sending you a notification).

If you have any questions about this Privacy Policy, please contact us at:

info@smartsingroup.com

HOW WE COLLECT AND USE INFORMATION

INFORMATION YOU PROVIDE TO US

- **Account Information:** When you use our mobile application, a username will be randomly assigned to you that you may change or delete at any time. Your username is publicly displayed when you interact with the Services, such as when you post a owls or send a chat message to another user. Please keep in mind that if your username contains your real name or is the same as how you identify yourself on other online services, people who see it may determine your identity. We may also ask you for, or you may choose to provide, additional information, such as age or gender, that will be associated with your owls account.
- **User Content:** When you interact with the Services, we collect the information and content you create. For example, we collect the text and/or image content

of your thoughts, replies,. All owls and replies are public and are publicly displayed (for information about deletion of owls, please see “Your Choices” below). They may be viewed, shared and modified by our users, us and others for commercial or personal purposes (consistent with the rights and licenses in our Terms of Use). Please keep in mind that if you include information that could identify you in the text or image of a owls, people who see it may determine your identity.

- Other Information: You may provide other information directly to us. For example, we may collect information when you fill out a form, update your account, interact with the Services, apply for a job at our company, communicate with us via third-party social media sites, request customer support or otherwise communicate with us.

OTHER INFORMATION WE COLLECT WHEN YOU USE THE SERVICES

- Location Information: Many features of the Services will not work unless you provide us with some information about your location. If you consent to the collection of location information (e.g. if you permit your mobile device to send us your latitude and longitude), we will collect and use this information both while you are directly using the Services and in the “background” (i.e. at times when you are not directly using the Services), so that we can tailor your interactions and experiences with the Services and to provide more relevant advertising to you on our Services and other websites and mobile applications. For example, we or our advertising partners may show you thoughts from people around you or places you frequently visit, notifications of things happening around you in real time, or advertisements from businesses near your location. If you do not permit your mobile device to provide us with location information, or location information is not available from your device for technical reasons, we may use your IP address or information about the

WiFi SSID from which you access the Services to determine an approximate geographic location for your device. For more details about how you may control the collection of location information, please see "Your Choices" below.

- **Usage Information:** We collect information about your use of the Services, including access times, pages and thoughts viewed, user and thoughts interactions (e.g. hearts, flags and replies) and other information about your interactions with us, the Services and other users. We use this information to, among other things, personalize your experience, provide and improve the Services, and monitor and analyze use of the Services.
- **Device Information:** We collect information about the device you use to access our Services, which may include the hardware model, operating system and version, browser type and language, IP address, unique device identifiers and mobile network information. Among other things, we use this information to customize the Service for your device, to provide customer service and support, to deliver the products and services you request, to deliver notifications, for user safety, and for analytics and authentication.
- **Information Collected by Cookies and Other Tracking Technologies:** Like most websites and applications, we and our service providers use cookies, web beacons and other technologies to collect information. Cookies are small data files stored on your hard drive or in device memory that help us and our service providers to, among other things, improve our Services and your experience by seeing which areas and features of our Services are popular. For more information about cookies, and how to disable them, please see "Your Choices" below.
- **Log Information:** We collect information in our log files when you use the Services. This includes, among other things, your browser and device type, language, access times, pages viewed, your IP address, and the URL you visited before navigating to our websites. We use log information to provide, understand, and improve our Services.

HOW WE SHARE INFORMATION

When you use the Services, certain information may be shared with other users and the public. For example:

- Any thoughts posted to the Services is public and, as a result, others may be able to see your username at the time the owls was posted, the text and image contents of your owls and the geographic location in which you posted your owls.
- If you post any User Content to the Services, other owls users may be able to see certain information related to your location. For example, other users may be able to see whether you are or were within a certain proximity of their current location or if you frequent similar locations.
- If you invite others to try owls via SMS, email or otherwise, those individuals may see your name, phone number, email address or other contact information.

We may also share information as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of owls or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among owls, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;

- If we have a good faith belief that disclosing the information is necessary to comply with a law, regulation, legal process, or governmental request; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

SOCIAL SHARING FEATURES

The Services may offer social sharing features and other integrated tools, which let you share thoughts with other media. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

ADVERTISING AND ANALYTICS SERVICES

To perform analytics and deliver relevant content and advertising, we may allow others to collect information about how you use our Services. For example, these entities may use cookies, device identifiers and similar technologies to collect information about your computer or device, the content that interests you, the places you visit, and the time you spend using different parts of our Services.

For more information about online advertising, or to opt out of having your web browsing information used by participating companies for behavioral advertising purposes, please visit the [Digital Advertising Alliance Consumer Choice Page](#) and the [Facebook Ad Choices Page](#). Your mobile device also may include a feature (“Limit Ad Tracking” on iOS or “Opt out of Interest-Based Ads” on Android) that

allows you to opt out of having certain information collected through our mobile application used for behavioral advertising purposes.

To learn more about our third-party partners and the choices they make available to you, please visit the policies of [Outbrain](#), [Taboola](#) and [ScorecardResearch](#).

YOUR CHOICES

ACCOUNT INFORMATION AND OWLS

Your thoughts remain public so long as you or we do not delete them from the Services. You may choose to delete your individual thoughts at any time, and we will then remove them from the Services. However, it is important to note that your deleted thoughts may remain in storage in our systems for a limited period of time for legal, business, safety, or system backup reasons, and they may remain accessible in cached and archived pages of the Services or elsewhere if others have chosen to copy or save them. Search engines and other sites may also index and cache content on our Services. You may have to contact these third-party sites or search engines directly to delete your cached information, subject to their policies and procedures.

If you wish to delete your account, please contact us by using the “Email Support” link in settings from inside the application, but note that we may retain certain information as required by law, for legitimate business purposes or for the safety of owls (including its users) and others. We may also retain cached or archived copies of information about you for a certain period of time.

LOCATION INFORMATION

When you first download or open any of our mobile applications or access certain features of the Services, you will be asked to consent to the collection of location information from your mobile device or platform. If you consent to the collection of this information but later wish to withdraw your consent, you may do so at any time

by either changing the settings on your mobile device or deleting our mobile application.

COOKIES

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.