

## **TAPP® Privacy Policy**

Last Updated: August 13, 2020

Your privacy and trust is important to us and we're committed to protecting the privacy and security of your personal information, so we've developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your personal information.

Please take a moment to familiarize yourself with our privacy practices, and if YOU have any questions please email us at [hello@tapp.group](mailto:hello@tapp.group).

We're happy to report that we participate in the EU-U.S. and Swiss-U.S. Privacy Shield, which you can read more about in Section 7.4 of this Privacy Policy.

And, if you're in the EU, there's some extra information we'd like to bring to your attention in Section 7 of this Privacy Policy.

If YOU see an undefined term in this Privacy Policy (such as "TAPP" or the "TAPP Platform"), it has the same definition as in our Terms of Service ("Terms").

### **1. Information We Collect.**

There are three general categories of personal information we collect:

- **Personal Information YOU Choose to Give Us.**
- **Personal Information We Get When YOU Use TAPP Services.**
- **Personal Information We Get from Third-Parties.**

Here's a little more detail on each of these categories.

#### **1.1 Personal Information YOU Choose to Give Us.**

When YOU interact with the TAPP Platform, we collect the personal information that YOU choose to provide to us. For example, most of the TAPP Platform require YOU to set up a basic TAPP Account, so we need to collect a few important details about YOU, such as: User Name, a password, an email address and/or a mobile telephone number. To make it easier for others to find YOU, we may also ask YOU to provide us with some additional personal information that will be publicly visible on the TAPP Platform, such as profile pictures, a name, User Name, or other useful identifying information. Other services, such as commerce products, may also require YOU to provide us with a debit or credit card number and its associated account information.

Of course, YOU will also provide us whatever personal information YOU send through the TAPP Platform, such as lists, recommendations, notes, messages, photograph(s), video(s), and any other Content to your friends. Keep in mind that the users who view your lists, recommendations, notes, messages photograph(s), video(s), and any other Content can always save that Content or copy it outside the TAPP Platform. So, the same common sense that applies to the internet at large applies to TAPP as well: Don't share Content or send messages or participate in chat that YOU wouldn't want someone to save or share.

It probably goes without saying, but we'll say it anyway: When YOU contact customer support or communicate with us in any other way, we'll collect whatever personal information YOU volunteer.

## 1.2 Information We Get When YOU Use Our Services.

When YOU use our services, we collect personal information about which of those services you've used and how you've used them. We might know, for instance, that YOU created a list, received a friend's list, and sent a few lists to friends. Here's a fuller explanation of the types of personal information we collect when YOU use the TAPP Platform:

- **Usage Information.** We collect personal information about your activity through the TAPP Platform. For example, we may collect personal information about:
  - how YOU interact with the TAPP Platform, such as which sharing filter YOU applied (Everyone, Only Friends, Only Me), which search queries YOU submit, how frequently do YOU create and/or share your Content.
  - how YOU communicate with other TAPP users, such as their names, the time and date of your communications, the number of messages or chats YOU exchange with your friends or participate in, which friends YOU exchange messages or chat with the most, and your interactions with messages (such as when YOU open a message or capture a screenshot).
- **Content Information.** We collect Content YOU create on the TAPP Platform, such as personal information about the Content YOU create or provide, such as if the recipient has viewed the Content and the metadata that is provided with the Content.
- **Device Information.** We collect personal information from and about the devices YOU use. For example, we collect:
  - personal information about your hardware and software, such as the hardware model, operating system version, device memory, unique application identifiers, apps installed, unique device identifiers, browser type, language, battery level, and time zone;
  - personal information from device sensors, such as accelerometers, gyroscopes, compasses, microphones, and whether YOU have headphones connected; and
  - personal information about your wireless and mobile network connections, such as mobile phone number, service provider, and signal strength.
- **Device Phonebook.** Because TAPP is all about offering users control to private communication with friends, we may—with your permission—collect personal information from your device's phonebook.
- **Camera and Photos.** Many of the services on the TAPP Platform require us to collect images and other personal information from your device's camera and photos. For example, YOU won't be able to send photograph(s) or upload photograph(s) from your camera and photos unless we can access your camera or photograph(s).
- **Location Information.** When YOU use the TAPP Platform we may collect personal information about your location. With your permission, we may also collect personal information about your precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses.
- **Information Collected by Cookies and Other Technologies.** Like most online services and mobile applications, our partners may use cookies and other technologies, such as web beacons, web storage, and unique advertising identifiers, to collect personal information about your activity, browser, and device. We may also use these technologies to collect personal

information when YOU interact with services we offer through one of our partners, such as commerce features. Most web browsers are set to accept cookies by default. If YOU prefer, YOU can usually remove or reject browser cookies through the settings on your browser or device. Keep in mind, though, that removing or rejecting cookies could affect the availability and functionality of the TAPP Platform. To learn more about how we use cookies and your choices, please check out our Cookie Policy.

- **Log Information.** We also collect log information when YOU use the Site and the TAPP Platform. That personal information includes, among other things:
  - details about how you've used the TAPP Platform.
  - device information, such as your web browser type and language.
  - access times.
  - pages viewed.
  - IP address.
  - identifiers associated with cookies or other technologies that may uniquely identify your device or browser.
  - pages YOU visited before or after navigating to the Site.

### **1.3 Information We Collect from Third-Parties.**

We may collect personal information about YOU from other users, and third-parties. Here are a few examples:

- If YOU link your TAPP account to another service (like a third-party app: eg. Amazon.com), we may receive personal information from the other service, like how YOU use that service.
- If another user uploads their contact list, we may combine personal information from that user's contact list with other personal information we have collected about YOU.

## **2. How We Use Information.**

What do we do with the personal information we collect? The short answer is: Provide YOU with an amazing set of products and services that we relentlessly improve. Here are the ways we do that:

- develop, operate, improve, deliver, maintain, and protect our products and services.
- send YOU communications, including by email. For example, we may use email to respond to support inquiries or to share information about our services and/or products, the TAPP Platform, and Content that we think may interest YOU.
- monitor and analyze trends and usage.
- personalize the TAPP Platform by, among other things, suggesting other users to follow or profile information, or customizing the Content we show YOU.
- contextualize your experience by, among other things, tagging your Content using your precise location information (if, of course, you've given us permission to collect that personal information) and applying other labels based on the Content.
- provide and improve measurement, including through the use of your precise location information (again, if you've given us permission to collect that personal information), both on and off the TAPP Platform. See the Control Over Your Personal Information in Section 6 below for more information about your choices.
- enhance the safety and security of our products and services.
- verify your identity and prevent fraud or other unauthorized or illegal activity.

- use personal information we've collected from cookies and other technology to enhance the TAPP Platform and your experience with them.
- enforce our Terms of Service and other usage policies.

### 3. How We Share Information.

We may share personal information about YOU in the following ways:

- **With other TAPP users.** We may share the following personal information with other TAPP users:
  - personal information about YOU, such as your User Name, and/or name.
  - personal information about how YOU have interacted with the TAPP Platform, such as the names of TAPP users YOU are friends with, and other personal information that will help TAPP users understand your connections with others using the TAPP Platform. For example, because it may not be clear whether a new friend request comes from someone YOU actually know, we may share whether YOU and the requestor have TAPP friends in common.
  - any additional personal information YOU have directed us to share.
  - Content YOU post or send. How widely your Content is shared depends on your personal settings and the type of service YOU are using. For example, a “Only Friends” Content may be sent to just a single friend YOU select, but your “Everyone” Content may be seen by any TAPP user whom YOU allow to see your “Everyone” Content.
- **With all TAPP users, our business partners, and the general public.** We may share the following personal information with all TAPP users as well as with our business partners and the general public:
  - personal information like your name, User Name, “TAPP invite code” and profile pictures.
  - Content that are set to be viewable by the public and any Content that YOU submit to an inherently public service, like the feed. This Content may be viewed and shared by the public at large both on and off the TAPP Platform, including through search results, on websites, in applications, and in online and offline broadcasts.
- **With third-parties.** We may share your personal information with the following third-parties:
  - **With service providers.** We may share personal information about YOU with service providers who perform services on our behalf. Learn more [here](#).
  - **With business partners.** We may share personal information about YOU with business partners that provide services and functionality. For more information about personal information collected by third-parties on the TAPP Platform, visit [here](#).
  - **With third-parties for legal reasons.** We may share personal information about YOU if we reasonably believe that disclosing the personal information is needed to:
    - comply with any valid legal process, governmental request, or applicable law, rule, or regulation.
    - investigate, remedy, or enforce potential Terms of Service violations.
    - protect the rights, property, and safety of us, our users, or others.
    - detect and resolve any fraud or security concerns.
  - **With third-parties as part of a merger or acquisition.** If TAPP gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of

all or some portion of our business to another company, we may share your personal information with that company before and after the transaction closes.

#### **4. Third-Party Content and Integrations.**

The TAPP Platform may also contain third-party links and search results, include third-party integrations, or offer a co-branded or third-party-branded service. Through these links, third-party integrations, and co-branded or third-party-branded services, YOU may be providing personal information directly to the third-party, us, or both. YOU acknowledge and agree that we are not responsible for how those third-parties collect or use your personal information. As always, we encourage YOU to review the privacy policies of every third-party service that YOU visit or use, including those third-parties YOU interact with through the TAPP Platform. To learn more about third-party services in TAPP, visit [here](#).

#### **5. How Long We Keep Your Information.**

TAPP lets YOU communicate and share Content with friends. Anyone who receives Content from YOU can save it, and share it with others at any time. Anyone who sees your Content can always potentially save them, whether by taking a screenshot or by using some other image-capture technology (whether that be a separate piece of software, or even simply taking a photo of their screen with a second camera).

On our end, most Content (e.g., Lists, Photos), are stored until YOU delete the Content from the TAPP Platform. If YOU delete the Content from the TAPP Platform, TAPP servers are designed to erase that Content as soon as possible.

We store other information for longer periods of time. For example:

- We store your account information—like your name, phone number, and/or email address—and list of friends until YOU ask us to delete them.
- We store location information for different lengths of time based on how precise it is and which services YOU use. For example, if YOU use the Map, we store personal information about your favorite places for up to 40 days so we can improve your experience. If location information is associated with a Photo—like those saved to Lists or posted to the feed—we'll retain that location as long as we store the Photo.
- We're constantly collecting and updating personal information about the things YOU might like and dislike, so we can provide YOU with more relevant Content and recommendations.
- If YOU ever decide to stop using TAPP, YOU can just ask us to delete your account. We'll also delete most of the personal information we've collected about YOU after you've been inactive for a while—but don't worry, we'll try to contact YOU first!

Keep in mind that, while our systems are designed to carry out our deletion practices automatically, we cannot promise that deletion will occur within a specific timeframe. There may be legal requirements to store your data and we may need to suspend those deletion practices if we receive valid legal process asking us to preserve Content or if we receive reports of abuse or other Terms of Service violations. Finally, we may also retain certain personal information in backup for a limited period of time or as required by law.

#### **6. Control over Your Personal Information.**

We want YOU to be in control of your personal information, so we provide YOU with the following tools.

- **Download My Data.** YOU can access and edit most of your basic account information right in the TAPP Platform. YOU can also email us at [my-data@tapp.group](mailto:my-data@tapp.group) to obtain a copy of personal information that isn't available in the TAPP Platform in a portable format, so YOU can move it or store it wherever YOU want. Because your privacy is important to us, we may ask YOU to verify your identity or provide additional personal information before we let YOU access or update your personal information. We may also reject your request to access or update your personal information for a number of reasons, including, for example, that the request risks the privacy of other users or is unlawful.
- **Revoking permissions.** If YOU let us use your personal information, YOU can always change your mind and simply revoke your permission by changing the settings on your device if your device offers those options. Of course, if YOU do that, certain services may lose full functionality.
- **Deletion.** While we hope you'll remain a lifelong TAPP user, if for some reason YOU ever want to delete your account, just go here to learn how. YOU can also delete some personal information in the TAPP Platform, like photograph(s) you've saved to lists or trips, and search history.
- **Communicating with other TAPP users.** It's important to us that YOU stay in control over whom YOU communicate with. That's why we've built a number of tools in Settings on the TAPP Platform, that let YOU indicate, among other things, who YOU want to see your feed, whether you'd like to receive messages from just your friends or all TAPP users, and whether you'd like to block another TAPP user from contacting YOU again.

## 7. Users in the European Union.

If you're a user in the European Union, YOU should know that TAPP Labs Inc. is the controller of your personal information. Here is some additional information we would like to bring to your attention:

### 7.1 Bases for using your information.

Your country only allows us to use your personal information when certain conditions apply. These conditions are called "legal bases" and, at TAPP, we typically rely on one of four:

- **Contract.** One reason we might use your personal information is because you've entered into an agreement with us. For example, when YOU buy a service and accepted our Terms of Payment, we need to use some of your personal information to collect payment.
- **Legitimate interest.** Another reason we might use your personal information is because we have—or a third-party has—a legitimate interest in doing so. For example, we need to use your personal information to provide and improve the TAPP Platform, including protecting your account, delivering your Content, providing customer support, and helping YOU find friends and Content we think you'll like. An important point to understand about legitimate interest is that our interests don't outweigh your right to privacy, so we only rely on legitimate interest when we think the way we are using your data doesn't significantly impact your privacy or would be expected by YOU, or there is a compelling reason to do so. We explain our legitimate business reasons for using your personal information in more detail [here](#).
- **Consent.** In some cases we'll ask for consent to use your personal information for specific purposes. If we do, we'll make sure YOU can revoke your consent in the TAPP Platform or through your device permissions. Even if we're not relying on consent to use your personal information, we may ask YOU for permission to access data like contacts and location.

- **Legal obligation.** We may be required to use your personal information to comply with the law, like when we respond to valid legal process or need to take action to protect our users. Our policy has been to notify TAPP users when we receive legal process seeking their account information, with some exceptions for cases where we are legally prohibited from doing so, or when we believe there are exceptional circumstances (like child exploitation or an imminent risk of death or bodily injury).

## **7.2 Your right to object.**

YOU have the right to object to our use of your personal information. With many types of data, we've provided YOU with the ability to simply delete it if YOU don't want us processing it anymore. For other types of data, we've given YOU the ability to stop the use of your data by disabling the feature altogether. YOU can do these things in the TAPP Platform. If there are other types of personal information YOU don't agree with us processing, please contact us by email at [hello@tapp.group](mailto:hello@tapp.group). In your email to us, please indicate the following: (i) your User Name or name, (ii) the email associated with your TAPP Account - if applicable, (iii) what personal information YOU don't agree with us processing - please provide as much detail as possible.

## **7.3 International Transfers.**

We may collect your personal information from, transfer it to, and store and process it in the United States and other countries outside of where YOU live. Whenever we share information of EU users outside the EU we make sure an adequate transfer mechanism is in place. For international transfers, we rely on Model Contractual Clauses or the EU-U.S. and Swiss-U.S. Privacy Shield, to learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>. YOU can find more information on the categories of third-parties we share personal information with [here](#).

## **7.4 EU-US & Swiss-US Privacy Shield.**

TAPP Labs Inc. complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. TAPP Labs Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, TAPP Labs Inc. committees to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact TAPP Labs Inc. at:

TAPP Labs Inc.  
Attn: Legal Department  
325 North Maple Drive, #5138  
Beverly Hills, CA 90209  
Email: [legal@tapp.group](mailto:legal@tapp.group).

If YOU do not receive timely acknowledgement of your complaint from us, or if we have not resolved your complaint, please contact or visit JAMS, an alternative dispute resolution provider located in the United States, for more information or to file a complaint: <https://jamsadr.com/file-an-eu-us-privacy-shield-claim>. The services of JAMS are provided at no cost to YOU.

In certain conditions, YOU may also have the right to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. To learn more about binding arbitration, see [\*\*Annex I to the EU-U.S. Privacy Shield and Annex I to the Swiss-U.S. Privacy Shield.\*\*](#)

The Federal Trade Commission has jurisdiction over TAPP Labs Inc.'s compliance with Privacy Shield. This is in addition to our requirement to disclose your personal information to public authorities upon the receipt of a lawful request, including requests made in relation to national security or law enforcement requirements, as discussed above in this Privacy Policy.

If we have received your personal information under the Privacy Shield and subsequently transfer it to a third-party service provider for processing as described in this Privacy Policy, we will remain responsible if these providers process your personal information in a manner inconsistent with the Privacy Shield Principles, except where we can establish that TAPP Labs Inc. was not responsible for the violation. If we share your personal information with third-parties for materially different purposes, we'll offer YOU an opt-out choice consistent with the Privacy Shield Principles.

## **8. Complaints?**

If you're based in the EU, YOU can always file a complaint with the supervisory authority in your Member State. For example, if you're based in the UK, YOU can file a complaint with the [\*\*Information Commissioner's Office.\*\*](#)

## **9. California Residents**

If you're a California resident, you have certain privacy rights under California law, including the California Consumer Privacy Act of 2018 ("CCPA"). Our California Privacy Notice specifies these rights, [\*\*here.\*\*](#)

## **10. Children**

The TAPP Platform is not intended for—and we don't direct them to—anyone under 13. And that's why we do not knowingly collect personal information from anyone under 13. In addition, we may limit how we collect, use, and store some of the information of EU users between 13 and 16. In some cases, this means we will be unable to provide certain functionality to these users. If we need to rely on consent as a legal basis for processing your personal information and your country requires consent from a parent, we may require your parent's consent before we collect and use that personal information.

## **11. Revisions to this Privacy Policy**

We may change this Privacy Policy from time to time. But when we do, we'll let YOU know one way or another. Sometimes, we'll let YOU know by revising the date at the top of the Privacy Policy that's available on our Site and mobile application. Other times, we may provide YOU with additional notice (such as adding a statement to our Sites' homepages or providing YOU with an TAPP Platform notification).

## **12. Contact.**

TAPP welcomes comments, questions, concerns, feedback or suggestions. Please contact us at:

TAPP LABS Inc.  
325 North Maple Drive  
#5138  
Beverly Hills, CA 90209  
Email: [hello@tapp.group](mailto:hello@tapp.group).