Privacy Policy

Effective August 27, 2020

Glimpulse LLC. is an expression company using photos, text, graphics and sound. Our products and services provide fast and fun ways to spread joy, lift others, remember precious moments, and celebrate your closest friends and family to have fun and bring a higher pulse of positivity to life.

We participate in the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks.

Information We Collect

There are three basic categories of information we collect:

- Information you provide.
- Information we get when you use our services.
- Information we get from third parties.

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

Information You Provide

When you interact with our services, we collect information that you provide to us. For example, most of our services require you to set up an account, so we need to collect a few important details about you, such as your name, username, password, email address, phone number and phone details. We may also ask you to provide us with some additional information that will be publicly visible on our services, such as a profile picture and which glimples you selected. Other services, such as future commerce products, may require you to provide us with a debit or credit card number and its associated account information.

Of course, you'll also provide us whatever information you send through our services, such as glimples and texts. Remember that users who you share your glimples with or view them can always save that content or copy it outside the app. So, the same common sense that applies to the internet at large applies to Glimpulse as well: Don't send messages or share content that you wouldn't want someone to save or share.

When you contact customer support or communicate with us in any other way, we'll collect whatever information you volunteer or that we need to resolve your question.

Information We Get When You Use Our Services

When you use our services, we collect information about which of those services you've used and how you've used them. We might know, for instance, that you selected a particular glimple, saw a specific ad for a certain period of time, and sent a few glimples and to who. Here's a fuller explanation of the types of information we collect when you use our services:

- **Usage Information.** We collect information about your activity through our services. For example, we may collect information about:
- how you interact with our services, such as which glimples you view or select, which search
 queries you submit, whether you include text or photos or your profile.
- o how you communicate with other Pulsers, such as their names, the time and date of your communications, the number of glimples you exchange with your friends, which friends you exchange glimples with the most, and your interactions with glimples (such as when you open a message or capture a screenshot or flip a glimple or add to it).
- Content Information. We collect content you create on our services, such as glimple covers, custom glimples, and information about the content you create or provide, such as if the recipient has viewed the content, how many times, have they saved it and the metadata that is provided with the content.
- **Device Information.** We collect information from and about the devices you use. For example, we collect:
- o information about your hardware and software, such as the hardware model, operating system version, device memory, advertising identifiers, unique application identifiers, apps installed, unique device identifiers, browser type, language, battery level, and time zone;
- o information from device sensors, such as accelerometers, gyroscopes, compasses, microphones, and whether you have headphones connected; and
- information about your wireless and mobile network connections, such as mobile phone number, service provider, IP address, and signal strength.
- **Device Phonebook.** Because Glimpulse helps you communicate with friends, we may—with your permission—collect information from your device's phonebook.
- Camera and Photos. Many of our services require us to collect images and other
 information from your device's camera and photos. For example, you won't be able to send
 glimples or upload photos or profile pictures from your camera roll unless we can access
 your camera or photos.
- Location Information. When you use our services we may collect information about your location. With your permission, we may also collect 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, we may use cookies and other technologies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity,

browser, and device. We may also use these technologies to collect information when you interact with services we offer through one of our partners, such as advertising and commerce features. For example, we may use information collected on other websites to show you more relevant ads. 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 our services.

- Log Information. We also collect log information when you use our app or website, such as:
- details about how you've used our services;
- device information, such as your web browser type and language;
- o access times;
- o pages viewed;
- IP address:
- identifiers associated with cookies or other technologies that may uniquely identify your device or browser; and
- o pages you visited before or after navigating to our website.

Information We Collect from Third Parties

We may collect information about you from other users, our <u>affiliates</u>, and third parties. Here are a few examples:

- If you link your Glimpulse account to another service (like third-party apps), we may receive information from the other service, like how you use that service.
- Advertisers, app developers, publishers, and other third parties may share information with us as well. We may use this information, among other ways, to help target or measure the performance of ads.
- If another user uploads their contact list, we may combine information from that user's contact list with other information we have collected about you.

How We Use Information

The main way we use information is to provide you with better products and services thru continuous improvement. Here are some of 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 products, services, and promotional offers that we think may interest you.
- monitor and analyze trends and usage.

- <u>personalize our services</u> by, among other things, suggesting glimples, friends, profile information, or customizing the content we show you, including ads.
- contextualize your experience by, among other things, tagging your glimple content using your name, time, date and precise location information (if, of course, you've given us permission to collect that information) and applying other labels based on the content.
- provide and improve our advertising services, ad targeting, and ad measurement, including through the use of your precise location information (again, if you've given us permission to collect that information), both on and off our services.
- enhance the safety and security of our products and services.
- verify your identity and prevent fraud or other unauthorized or illegal activity.
- use information we've collected from cookies and other technology to enhance our services and your experience with them.
- enforce our Terms of Service and other usage policies and comply with legal requirements.

How We Share Information

We may share information about you in the following ways:

- With other Glimpulsers. We may share the following information with other Glimpulsers:
- o information about you, such as your username and name.
- information about how you have interacted with our services, the names of Pulsers you are friends with, and other information that will help Glimpulsers understand your connections with others using our services. 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 friends in common.
- o any additional information you have directed us to share. For example, we will share your information when you connect your account to a third-party app, and if you share information or content from Glimpulse to the third-party app.
- o 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 glimple may be sent to just a single friend you select, or a group but your glimple content may be seen by anyone if you or someone you share with posts so others can see your glimples.
- With all Glimpulsers, our business partners, and the general public. We may share the following information with all Glimpulsers as well as with our business partners and the general public:
- o public information like your name, username, and profile pictures.
- o Glimples that are set to be viewable by Everyone and any content that you submit to an inherently public service. This content may be viewed and shared by the public at large both

on and off our services, including through search results, on websites, in apps, and in online and offline broadcasts.

- With our affiliates, such as Lifter Leadership.
- With third parties. We may share information about you with service providers who perform services on our behalf, including to measure and optimize the performance of severs, ads and deliver more relevant ads, including on third-party websites and apps.
- We may share information about you with business partners that provide services and functionality on our services.
- We may share information about you, such as device and usage information, to help us and others prevent fraud.
- We may share information about you for legal, safety, and security reasons. We may share information about you if we reasonably believe that disclosing the 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, or safety of us, our users, or others.
- detect and resolve any fraud or security concerns.
- We may share information about you as part of a merger or acquisition. If Glimpulse 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 information with that company before and after the transaction closes.

We may also share with third parties that provide services to us or perform business purposes for us aggregated, non-personally identifiable, or de-identified information.

Third-Party Content and Integrations

Our services may contain third-party content and integrations. Through these integrations, you may be providing information to the third party as well as to Glimpulse. We are not responsible for how those third parties collect or use your 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 our services.

How Long We Keep Your Information

Glimples and other content are those magic moments, those connected memories and moments of gratitude that you, or your friends, will want to return to time and time again to feel uplifted. Thus, glimples are backed up by Glimpulse.

If you delete a Glimple, our servers are designed to erase that glimple as soon as possible.

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

- We store your basic account information—like your name, phone number, and 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.
- We're constantly collecting and updating information about the things you might like and dislike, so we can provide you with more relevant content and advertisements.
- If you ever decide to stop using Glimpulse, you can just ask us to delete your account.
- 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, if we receive reports of abuse or other Terms of Service violations, or if your account or content created by you is flagged by our automated systems for abuse or other Terms of Service violations. Finally, we may also retain certain information in backup for a limited period of time or as required by law.

Control Over Your Information

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

- Access, Correction, and Portability. You can access and edit most of your basic account information right in our apps. Because your privacy is important to us, we will ask you to verify your identity or provide additional 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, if the request risks the privacy of other users or is unlawful.
- **Revoking permissions.** In most cases, if you let us use your information, you can simply revoke your permission by changing the settings in the app or 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 Glimpulser, if for some reason you ever want to delete your account, contact us. You can also delete some information in the app, like glimples and friends.
- Advertising Preferences. We try to show you ads that we think will be relevant to your interests.

• Communicating with other Glimpulsers. 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 that let you indicate, among other things, who you want to send your glimples to and who sees them.

Users in the European Union

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

Rights of Access, Deletion, Correction, and Portability

You can exercise your rights of access, deletion, correction, and portability.

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 Glimpulse, we typically rely on one of four:

- **Contract.** One reason we might use your information is because you've entered into an agreement with us.
- Legitimate interest. Another reason we might use your information is because we have—or a third party has—a legitimate interest in doing so. For example, we need to use your information to provide and improve our services, including protecting your account, delivering your glimples, providing customer support, and helping you find friends and content we think you'll like. Because most of our services are free, we also use some information about you to try and show you ads you'll find interesting. 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.
- Consent. In some cases we'll ask for consent to use your information for specific purposes. If we do, we'll make sure you can revoke your consent in our services or through your device permissions. Even if we're not relying on consent to use your 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.

Your Right to Object

You have the right to object to our use of your 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 app or feature altogether.

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 internal transfers, we rely on Model Contractual Clauses or the EU-U.S. and Swiss-U.S. Privacy Shield.

Complaints? If you're based in the EU, you can always file a complaint with the supervisory authority in your Member State.

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").

Children

Our services are 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 information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

Revisions to the 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 website and mobile application. Other times, we may provide you with additional notice (such as adding a statement to our websites' homepages or providing you with an in-app notification).