# **Privacy Policy**

Last updated: October 18, 2021

Ploinks, Inc. ("us", "we", or "our") operates the Ploinks® software applications and related services (collectively, the "Services").

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Services. We have a separate privacy policy for our Ploinks®website (<a href="http://www.ploinks.com/assets/docs/Ploinks-appPrivacy.pdf">www.ploinks.com/assets/docs/Ploinks-appPrivacy.pdf</a>

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information (which is defined below) for providing and improving the Services. By using the Services, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Use concerning our Services which may be found at http://www.ploinks.com/terms.html

## **Personal Information Collection and Use**

While using our Services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your email address, name, and phone number ("Personal Information"). We collect this information for the purpose of providing the Services, identifying and communicating with you, responding to your requests/inquiries, servicing your purchase orders (like through Google Play or another third-party service provider that processes payments), and improving our Services.

Please see the section regarding Location Information below regarding the use of your location information and your options.

#### Personal Information We Do Not Collect or Use

Our Services allow you to display, link, store, share and otherwise make available certain information, text, graphics, videos, or other material ("Content") to other users of the Services. We do not collect any personal info related to Content you display or share with other users or with such Content stored on your device when using our Services. In fact, we cannot collect personal information related to such Content you store on your device, display or share with other users because we do not have access to such Content.

You are responsible for the Content that you display or share using the Services, including its legality, reliability, and appropriateness.

#### Use of Your Phone Number and Use of Names and Phone Numbers in Your Contacts

In order for you to use our Services and share Content with other users, the Ploinks® application will use your phone number as a unique identifier in order to share Content with other users you decide to communicate with. The Ploinks® application will also use your contacts, including names and phone numbers, to share information with other users you share Content with.

While the Ploinks® application will use the names and phone numbers of your contacts to share Content with through the Ploinks® application located on your device(s), we do not store any information of your contacts on our servers since this information only resides on the Ploinks® application on your device(s).

### **Location Information**

We may use and store information about your location depending on the permissions you haveset on your device. We use this information to provide features of our Services, to improve and customize our Services. You can enable or disable location services when you use our Serviceat any time through your mobile device settings.

## **Third Party Behavioral Tracking**

It's also important to note that we do not allow third-party behavioral tracking.

### **Service Providers**

We may employ third-party companies and individuals to facilitate our Services, to provide our Services on our behalf, to perform Service-related services and/or to assist us in analyzing how our Services are used.

These third parties have access to your Personal Information only to perform specific tasks on our behalf and are obligated not to disclose or use your information for any other purpose. As an example, our Ploinks® applications are services we make available on Google Play. Consequently, any and all information you provide to Google will be governed by Google's Terms of Use and Privacy Policy.

## **Communications**

We may use your Personal Information to respond to you if you have contacted us directly.

#### **Compliance with Laws**

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Services. We may disclose your Personal Information if we determine that such disclosure is reasonably necessary to protect any person from death or serious bodily injury, prevent fraud or abuse of our Services or our users, or protect Ploinks, Inc.'s property rights.

## **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of dataprotection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices, should we learn a data breach has occurred, we will notify users via in-site notification within 7 business days.

#### **Business Transaction**

If Ploinks, Inc. is involved in a merger, acquisition or asset sale, your Personal Information maybe transferred as a business asset. In such cases, we will provide notice before your Personal Information is transferred and/or becomes subject to a different Privacy Policy.

## Security

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

We do not use regular malware scanning. We do not use vulnerability scanning and/or scanning to PCI standards.

Your Personal Information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology.

We do not ask for credit card numbers, since all payments are processed through a gateway provider (such as Google Play) and are not stored or processed by us.

However, please be aware that no method of transmission over the internet or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.

## **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require any entity that owns or operates a commercial websites or online service to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. See more http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf

According to CalOPPA, we agree to the following:

- Users can visit our Website anonymously.
- Once this Privacy Policy for our Services is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.
- You will be notified of any Privacy Policy changes concerning your use of our Services on our Privacy Policy page that applies to our Services (we have a separate Privacy Policy for the Website).
- You can change your personal information by logging in to your account.

#### **Links to Other Sites**

Our Services may contain links to other sites that are not operated by us. In addition, users of our Services may share links to other websites which are not known to us. If you clickon a third-party link, you will be directed to that third party's site.

We strongly advise you to review the privacy policy of every site you visit. We have no controlover, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **Children's Privacy**

We do not knowingly collect personally identifiable information from children under 13 without parental (or guardian's) consent. If you are a parent or guardian and you learn that your child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a child under age 13 without the consent of that child's parent or guardian, we will take steps to remove that information from our servers.

## **Changes to This Privacy Policy**

This Privacy Policy is effective as of October 18, 2021, and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should checkthis Privacy Policy periodically. Your continued use of the Services after we post any modifications to the Privacy Policy on this page or otherwise make available through the Services will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you through one the following methods: through the email address you have provided us (if applicable), notifying youvia the Ploinks® application, or by placing a prominent notice on our website.

#### **Contact Us**

If you have any questions about this Privacy Policy, please contact us. You may reach us byemail at legal@ploinks.com.