# **Privacy Policy**

Last updated: June, 27, 2018

We know that you care about how your personal information is used and shared, and we take your privacy seriously.

## What Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of personal information that we gather when you use any of our mobile applications or related services (collectively, the "Services"). This policy does not apply to the practices of third parties that we do not own or control, or to individuals that we do not employ or manage.

## What Personal Information Do We Collect and How is the Information Used?

Our primary goal in collecting personal information is to provide you with a friendly, customized, and efficient experience. We collect the following types of information from our users:

#### Information You Provide to Us

We receive and store any information you enter into our Services or provide to us in any other way, which may include personal information. Personal information is any information about you that is personally identifiable, such as your name, address, email address or phone number, and any other information that is not otherwise publicly available. You can choose not to provide us with certain information, but then you may not be able to take advantage of many of the features our Services provide. The personal information you provide is used for such purposes as responding to your requests for certain services, customizing the content and advertising you see, and communicating with you about specials, surveys and new products and services.

#### **Automatic Information**

We receive and store certain types of information whenever you interact with us. Our service automatically collects usage information, such as the numbers and frequency of visitors to our Services and its components, similar to TV ratings that indicate how many people watched a particular show. This data is only used in the aggregate. This type of collective data enables us to figure out how often customers use parts of the Services, so we can make the Services appealing to as many users as possible.

#### **Advertising Data**

We collect, store and analyze data regarding the advertisements that are shown to you and other end users on the third-party applications that are accessed using our Services. We use and store this information in anonymized form so that it is not associated with individual end users and does not include personal information.

## Will The App Share Any of the Information it Receives?

We will not sell, rent, transfer or otherwise disclose your personally identifiable information to third parties, except as provided in this Privacy Policy or as otherwise expressly authorized or directed by you.

We may share anonymized information with third parties for any purpose, including, without limitation, for market research, data modeling, and analytics. The anonymized information that we may share includes the advertising data that we collect, store and analyze.

We may share personally identifiable information we collect from and about you with third parties in the following instances:

- With our service providers, if the disclosure will enable them to process payments made by you using the Services or otherwise perform a business, professional or technical support function for us or you;
- As necessary, if we believe that there has been a violation of the the applicable Terms of Service for the Services or of our rights or the rights of any third party;
- As necessary, to identify, investigate, prevent or take action regarding illegal activities or suspected fraud or other abuse related to the Services; and
- To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law.

In addition, we reserve the right to disclose and transfer your information, including your personally identifiable information and anonymized information about you: (a) to a subsequent owner, co- owner or operator of the Services; or (b) in connection with a merger, consolidation, restructuring, the sale of substantially all of our equity ownership interests and/or assets or other corporate change, including during the course of any due diligence process.

## Can Children Use Courzeo's Services?

Our Services are not intended for children under 13 years old. You must be over 13 to access our services.

## **Third Party Sites**

The Services may permit you to link to other websites on the Internet, and other websites may contain links to the Services. These other websites are not under our control. The privacy and security practices of websites linked to or from the Services are not covered by this Privacy Policy, and Courzeo is not responsible for the privacy or security practices or the content of such websites.

## Security

We take commercially reasonable steps to ensure data privacy and security including through various hardware and software methodologies. However, due to the open communication nature of the Internet, we cannot guarantee that communications between you and us or our Services will be free from unauthorized access by third parties. Users of the Services do so at their own risk with respect to such communications. We do not accept any responsibility or liability for actions that may result from your data or information being intercepted or accessed by an unauthorized third-party.

## **Changes to this Privacy Policy**

We may modify this Privacy Policy from time to time by posting updates on this page. Please check back periodically to view any updates.

#### **Questions or Concerns**

If you have any questions or concerns regarding privacy at Courzeo, please send us a detailed message to <u>contact@courzeo.com</u>