

# PRIVACY POLICY, EXPOSURE.CO

Last modified: **May 23rd 2018**

Exposure Labs Inc., (“**Exposure**”) cares deeply about the privacy of its visitors and users and would like to share the steps it takes to protect your personal information in compliance with data privacy laws. The below policy describes: (1) what information may be collected; (2) how such information may be used; and (3) your rights as a visitor or user of this site regarding such information. Information may be collected at [www.exposure.co](http://www.exposure.co) (the “**Site**”). Exposure uses this information to deliver the services offered on the Site, to inform you of changes to the Site or your account, to enhance the Site, to prevent illegal or potentially prohibited conduct, and to enforce our Terms of Use (the “**Terms**”), which incorporate this Privacy Policy by reference.

Before you access or use any of our services we encourage you to read the entire Privacy Policy. A short summary is below:

- We collect information related to your use of the Site:
- Such information is used to provide you the services on the Site:
- You have the right to request the deletion of your personal information at any time and for any reason by contacting: **hello@exposure.co**.

## **1. Please Read the Whole Policy**

This Privacy Policy governs Exposure’s information management policies including how Exposure gathers, stores or shares your information, if at all. Notwithstanding anything to the contrary, this Privacy Policy does not apply to information that is gathered or collected offline. By using the Site and by submitting information to Exposure, you agree to the practices described in this Privacy Policy and to any other applicable terms, including the Terms. This Privacy Policy is intended to provide you with a clear explanation of how, when and why we collect and use your personal information, as well as an explanation of your legal rights. Nothing in this policy is intended to override the terms of any contract you have with us or any rights you have under applicable data privacy laws.

Please read the **entire** policy and make sure you fully understand our practices before using our services. If you do not agree with our practices you must immediately leave the Site. If you have any questions after fully reading the policy, please contact us at:

**hello@exposure.co**.

## 2. What Information Is Collected?

We collect two types of information from visitors and users. The first, unidentified and non-identifiable information (“**Anonymous Information**”) does not enable Exposure to identify the visitor or user from whom it was collected. The Anonymous Information collected by Exposure consists of (1) the date, time and length of your visit; (2) your Internet browser, operating system or Internet service provider; and (3) the referring site, advertisement or email linking to and from the Site. Exposure may, from time to time, also collect information regarding your wireless device (if any). We may collect information about your wireless device and your wireless communications carrier. Exposure may aggregate, use and share Anonymous Information with third parties for marketing and advertising purposes.

The second type of information we collect is individually identifiable information, meaning information that can identify an individual or may, with reasonable efforts, lead to the identification of an individual (“**PII**”). PII collected by Exposure consists of contact details provided by users when creating a user account (“**User Account**”) (e-mail address, full name, contact information, date of birth), billing details (name, physical billing address, payment method, and transaction details, which are only collected from users who opt-in to use paid services), browsing and usage session details (IP address, geo-location, device unique identifiers), details regarding connected third-party accounts (PayPal, Google, Facebook), correspondence through the Site, and any other PII provided directly by users and visitors to Exposure. If any Anonymous Information is linked to PII, it is treated as PII as long as the connection exists.

Please note that your name may be publicly available on the Internet when you use some features of the Site, such as user comments, forums, instant messaging, e-mail, or social networking functions. Use your discretion when using these services. It is your responsibility to review what information you wish to share with members and non-members of the Site. You are solely responsible for any public content in your user profile. You may review, amend or delete any and all information and content associated with your User Account by signing in to your account on the Site. You may also request the deactivation of your User Account by sending an e-mail to [hello@exposure.co](mailto:hello@exposure.co).

## 3. How Is Information Collected?

Exposure collects information about you only if we have a reason for such collection, such as to provide the services, to communicate with you, or to improve our Site.

Information is collected in three ways:

(a) **Information collected automatically through accessing the Site.** When you visit the Site (or any website), your actions while you browse the Site, upload information,

download information, or access any links, either directly through the Site or with the help of third-party services such as cookies, are tracked. Learn more about how we use cookies and third-party services in Section 7 below.

(b) **Information you provide Exposure.** When you register for our services, we collect the PII you provide us, similarly when you sign into Exposure via third-party party services such as Facebook, and when you pay for services we collect PII. We also store all communications you have directly with us (support tickets, emails).

(c) **Information obtained from outside sources.** You can learn more about these practices in Section 7 below.

#### **4. Why Is Information Collected?**

Both Anonymous Information and PII is collected so that Exposure may provide the services on the Site. This includes: correspondence from Exposure regarding your User Account, to further develop and improve the services based on user preferences, to provide customer assistance and technical support, to create aggregated statistical data from Anonymous Information which Exposure or its partners may use to provide or improve their respective services, and to enhance data and fraud security capabilities. Exposure will not sell, license, rent, or otherwise disclose your PII except as stated herein, or under the following circumstances: (1) you have given your consent; (2) we previously notified you of the disclosure in this Privacy Policy or when you provided your information on the Site; (3) we are compelled by law, legal process, or court order to disclose; (4) disclosure is required to identify, contact, or bring legal action against someone who may cause harm to, or interference with, Exposure's rights or property, our users, or anyone else; or (5) to respond to an inquiry, request or complaint that you have made. Exposure may cooperate with Internet service providers to identify users whenever required to comply with law, to enforce compliance with this Privacy Policy or our Terms, or to protect the Site, our customers and others.

#### **5. Where is Information Stored?**

Exposure uses industry standard technologies to safeguard your data (both Anonymous Data and PII) from unauthorized use and disclosure and to prohibit possible security breaches of the Site. Unfortunately, no website, computer system or online communication is completely secure. Exposure cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. Your use of the Site is at your own risk.

Exposure will take commercially reasonable steps to use heightened security technologies to protect the transmission and storage of transactional information to the Site. Such heightened security measures may include the secure transmission and encryption of all supplied sensitive financial or other transaction-related information.

Such information will only be accessible by authorized individuals with special access rights to our payment systems.

Unless otherwise specified, whenever you make a purchase, your financial and other transaction-related information will only be used to process your transaction and will not be stored on our servers or used for marketing purposes.

Data will be maintained, processed and stored by Exposure in the United States of America or other jurisdictions, as necessary, for proper delivery of the services or as required by law.

## **6. Requesting Deletion of Information and Your Rights**

Upon written request Exposure will provide you with information about whether we hold any of your PII. You may access, correct, or request deletion of your PII by emailing: **hello@exposure.co**. We will respond to your request within a timeframe imposed by local laws or a reasonable timeframe.

Please note that permanently deleting your Exposure User Account erases all of your information from our system. After completing this process your User Account and all its data will be removed permanently, and Exposure will not be able to restore your User Account or retrieve your data in the future.

If you are located in countries that fall under the scope of the European General Data Protection Regulation (“GDPR”), data protection laws give you rights with respect to your personal data, subject to exemptions provided by law. These rights include:

- The right to request access to your personal data;
- The right to request correction or deletion of your personal data;
- The right to object to the use and processing of your personal data;
- The right to request that Exposure limit its use and processing of your personal data;
- The right to request portability of your personal data.
- The right to make a complaint to a governmental supervisory authority.

Exposure strives to provide these rights to all visitors and users. Please email us at **hello@exposure.co** with any requests, questions, or concerns.

## **7. Cookies and Third-Party Providers**

Some features and advertisements on the Site may contain “cookies” or similar preference-tracking technologies. A cookie is a small data file stored by your Internet browser, provided that your computer is set to accept cookies. Cookies help improve the user experience by identifying and gathering information about a user, their browser and preferences for websites they have already visited. The use of cookies allows us to better understand how our users interact with the Site so we can work to improve your user experience.

Most modern Internet browsers allow you to change your settings to prevent the storage of new cookies, receive warnings prior to their storage, or to delete cookies from your computer altogether. Please review your browser's instructions for more information or visit <http://www.cookiecentral.com/faq>. Please be aware that if you choose to disable cookies, some portions of the Site may cease functioning properly.

Exposure does not and cannot control cookies in advertisements placed by our authorized advertising partners. This Privacy Policy does not govern the privacy practices of third parties who gather information directly from you to provide advertisements on this Site and other websites. The Site may embed or contain links and advertisements for third party websites. Similarly, third-party websites may embed or contain links and advertisements for the Site. Exposure cannot control and is not responsible for the privacy practices or content on any non- Exposure websites. Exposure is therefore not liable for your use of and exposure to such third-party websites and any content or advertisements they contain. You should familiarize yourself with the privacy policies and terms of use of these third parties to better understand their information management policies.

If you choose to opt in to receive communications from a third party, any information you provide to said third party, will be subject to the privacy policy of the third party. If you later decide to opt out, you should contact the third party directly.

Where permitted by local data laws, Exposure may disclose or otherwise allow others to access your PII pursuant to a legal request, such as a subpoena, legal proceedings, search warrant or court order, or in compliance with applicable law. If we have a good faith belief that the law requires disclosure, we may disclose your PII, with or without notice to you.

## **8. Children and Privacy**

This Site is NOT directed towards children under the age of 13. Exposure recognizes the importance of maintaining the privacy of children, especially those under the age of 13. Exposure is committed to complying with all applicable laws and regulations regarding children, including the Children's Online Privacy Protection Act ("**COPPA**"), 15 U.S.C. § 6501, et seq.

Except in limited circumstances allowed by COPPA, Exposure does not and will not knowingly request, collect, store, maintain, or share any personally identifiable information of children under the age of 13, without first obtaining the consent of a legal guardian. In those limited instances, Exposure will only collect reasonably necessary information, and Exposure will not share with third parties any personally identifiable information of a child under the age of 13 without the explicit consent of a legal guardian, or as permitted by COPPA or other applicable law.

You may revoke your consent and request the removal of your child's information at any time. If you are the legal guardian of a child under the age of 13 and discover that your child has submitted their personally identifiable information without securing your consent, Exposure will use commercially reasonable efforts to remove this information. If at any point you wish to review, amend, or request the removal of your child's information, please send an e-mail to **hello@exposure.co** and provide the name and account information for your child's user account.

### **9. Notification of Changes**

Exposure may at any time and in its sole discretion, add, modify, or remove any feature, function or portion of the Site, the Terms, and/or the Privacy Policy, in whole or in part, with or without notice to you, prior or otherwise. Any changes to the Privacy Policy will be effective as of the posting date. Exposure will provide prominent notice on the Site of any major changes to the Privacy Policy. Your continued use of the Site after Exposure posts any modifications to the Privacy Policy shall be deemed your explicit acceptance of those modifications and shall constitute your agreement to comply with the Privacy Policy, as modified.

### **10. Notice to California Users**

California Civil Code Section 1798.83 permits users who are California residents and who have provided with "personal information" (as that term is defined in Section 1798.83) to request certain information about the disclosure of that information to third parties for their direct marketing purposes. If you are a California resident with questions regarding this, or how the Exposure reviews and processes any request from you to amend your personal information, please contact us as [hello@exposure.co](mailto:hello@exposure.co)

### **11. Contacting Us**

If there are any questions regarding this Privacy Policy you may contact us using the information below.

Exposure Labs Inc.

Attn: Legal Department

**hello@exposure.co**