

**Effective Date: July 20, 2020**

## **Privacy Policy**

Push Play Labs Inc., a Delaware limited liability company and its affiliates and subsidiaries (collectively, the “Company” or “we” or “us”) is committed to protecting privacy of your personal data. This Privacy Policy (the “Policy”) applies to those who visit the websites owned and operated by the Company, download any downloadable software, install any mobile applications, and/or use the Company’s products and services (collectively, the “Services”). For purposes of this Policy, personal data shall mean any information relating to an identified or identifiable natural person. This might be by reference to an identifier such as a name, ID number, location data or online identifier, or by factors specific to them, such as their physical, genetic, economic or social identity.

This Privacy Policy describes how the Company collects, uses, shares and secures the personal data of the Users of the Services (the “User(s)” or “you” or “yours”, as applicable). It also describes the User’s choices regarding use, access and correction of the User’s personal data. The capitalized terms used in this Policy but not defined herein shall have the same meaning assigned to them in Company’s Terms of Service (the “Terms”).

### **DATA TRANSFER**

The Company is a global company, based in the United States. As such, we may transfer and access such personal information from around the world, including from other countries. In transferring your personal information, we will rely on lawful measures to transfer your personal information outside the EEA and Switzerland. If you are visiting the Services from the EEA or other regions with laws governing data collection and use, please note that by providing this personal information, you acknowledge that your personal information may be transferred to the United States and other jurisdictions in which we operate.

### **INFORMATION COLLECTION AND USE**

The Company gathers two types of information: (1) personally identifiable information that is supplied voluntarily upon registration for Services, ordering products from Services, or when you enter certain other areas of the Company’s websites and (2) aggregate tracking and site usage information that is gathered automatically when you use the Services. It is Company’s policy to use the personally identifiable information acquired at Company’s websites for internal business uses only and to provide content, products and Services. The Company operates and maintains a variety of online security measures to safeguard and keep personal data private.

### **Information That You Provide to Us**

When you register for an account to access or utilize the Services (an “Account”), we ask for and may collect personal information about you such as your name or your company, address, phone number, email address, credit card or other payment method information (collectively, an “Account Information”). By providing us with Account Information, you represent that you are the owner of such personal data or otherwise have the requisite consent to provide it to us.

*The Company only collects "sensitive" personal information when you voluntarily provide us with this information or where such information is required or permitted to be collected by law or professional standards. Sensitive information includes personal information regarding a person's race, ethnicity, political, philosophical religious or similar beliefs, trade union membership, physical or mental health, sexual life, sexual orientation, or criminal record.*

*Please use your discretion when providing sensitive information to the Company, and under any circumstances, **do not provide sensitive information to the Company, unless you thereby consent to the Company's use of that information for its legitimate business purposes and consent to the transfer and storage of such information to and in the Company's databases.** If you have any questions about whether the provision of sensitive information to the Company is, or may be, necessary or appropriate for particular purposes, please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com).*

### **Third Party Channels**

We may provide an option to access or register for the Services through the use of your user name and passwords for certain services provided by third parties (each, a "Third Party Channels"), such as through the use of your Microsoft or Google account. By authorizing us to connect with a Third Party Channels, you authorize the Company to access and store the information that the Third Party Channels makes available to us, and to use and disclose it in accordance with this Policy. It is your responsibility to check your privacy settings for such Third Party Channels (please review the terms of use and privacy policy of such Third Party Channels) to control what information is available to us.

### **Automatic collection of personal information**

In some instances, the Company and its service providers use cookies, web beacons and other technologies to automatically collect certain types of information when you use the Services, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience; improve the performance, usability and effectiveness of the Services; advertise and market our services; measure the effectiveness of our marketing activities; and generate and analyze statistics about your use of the Services.

### ***IP addresses***

An IP address is a number assigned to your computer or internet-enabled device whenever you access the internet. It allows computers and servers to recognize and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to maintain and improve the Services and to generate and analyze statistics about the Services and your use of the Services.

### ***Other Browser Data***

We may also collect your browser information (e.g., apps you use, duration of use, etc.), Browser code and signature Browser and OS version, Extensions and version numbers that are installed, a list of open URLs, User account information (name, email, license type), hardware information, and other browser configurations.

### **Cookies**

**Cookies** are text files put on your computer to collect standard internet log information and visitor behavior information. This information is then used to track visitor use of the website and to create statistical reports on website activity.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some the Services features may not function because of this.

**BY ACCESSING OR USING THE SERVICES OR ENTERING YOUR LOGIN DETAILS TO ACCESS AREAS RESERVED FOR REGISTERED USERS, YOU AGREE THAT WE, OR A THIRD PARTY ACTING ON OUR BEHALF, CAN PLACE THESE COOKIES ON YOUR COMPUTER OR INTERNET ENABLED DEVICE.**

### *Usage Analytics*

We use several third party usage analytics tools including Google Analytics. More information about how Google Analytics is used by the Company can be found here: <http://www.google.com/analytics/learn/privacy.html>. To provide website visitors with more choice on how their data is collected by Google Analytics, Google has developed the [Google Analytics Opt-out Browser Add-on](#). The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the Online Services or to other web analytics services.

### *Web beacons*

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. We only uses web beacons in accordance with applicable laws. The Company or its service providers may use web beacons to track the effectiveness of third party web sites that provide us with

## **HOW WE USE INFORMATION THAT WE COLLECT**

### Permitted Purposes:

We may use the information we collect about you (including personal information, to the extent applicable) for a variety of purposes, including to (a) provide, operate, maintain, improve, and promote the Services; (b) enable you to access and use the Services; (c) process and complete transactions; (d) provide customer service and support and send you related notices; (e) send promotional communications; (f) process and deliver contest or sweepstakes entries and rewards; (g) monitor and analyze trends, usage, and activities in connection with the Services and for marketing or advertising purposes; (h) monitor and assess compliance with our policies and standards; and (i) for other purposes for which we obtain your consent. With regard to newsletters, updates and other general communications, we will - where legally required - only provide you with such information if you have opted in. You have the opportunity to opt out of receiving such communications at any time

### Legal Basis for Processing (EEA only):

If you are an individual from the European Economic Area (EEA), we use your personal data, we may process your personal data on one or more of the following legal grounds: (i) because processing is necessary to perform a contract with you, such as to deliver the Services; (ii) to comply with our legal obligations; (iii) because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms. We may also process your data based on your consent where you have expressly given that to us.

## **HOW WE SHARE THE INFORMATION THAT WE COLLECT**

We share information, including personal information, with our third-party service providers that we use to provide hosting for and maintenance of the Services. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms and conditions, or as otherwise required by law

We may share your personal data with any third party to whom we assign or novate any of our rights or obligations, or that acquires all or substantially all of our business, stock or assets, or with whom we merge

We may also instruct service providers, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. We will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

We will otherwise only disclose your personal data when you direct us or give us permission to do so, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Where we rely on your consent to process the personal information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our (or a third party's) legitimate interests which are not already described in this Notice, we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com).

## **SECURITY PRECAUTIONS**

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and

once it is received. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law

## **HOW LONG WE RETAIN YOUR PERSONAL INFORMATION:**

We will retain your personal information for as long as is needed to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. For personal information that we process on behalf of our Users, we will retain such personal information in accordance with the terms of our agreement with them, subject to applicable law.

## **YOUR PRIVACY RIGHTS**

Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). Users may update or change their Account Information by editing their profile within the Services. To make a request to have personal information maintained by us returned to you or removed, please [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). Requests to access, change, or remove your information will be handled within thirty (30) days; provided that, notwithstanding such request, this information may be retained for as long as you maintain an account for the Services, or as needed to provide you with Services, comply with our legal obligations, resolve disputes and enforce our agreements. Upon receipt of a request from one of our Users for us to remove the data, we will respond to their request within thirty (30) days. We will retain personal information that we store and process on behalf of our Users for as long as needed to provide the Services to our Users. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **ADDITIONAL RIGHTS FOR EEA AND CERTAIN OTHER TERRITORIES:**

If you are from certain territories (such as the EEA), you may have the right to exercise additional rights available to you under applicable laws, as follows:

### *What is a Subject Access Request?*

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). We will respond to your request within thirty days of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request

### *Objections to processing of personal data*

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” apply. The only reasons we will be able to deny

your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defense of a legal claims. To invoke this right, please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

#### *Data Portability*

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

To invoke this right, please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request

#### *Your Right to be Forgotten*

Should you wish for us to completely delete all information that we hold about you for, contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com). Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint.

### **CHILDREN'S PERSONAL INFORMATION**

We do not knowingly collect any personal information from children under the age of 13. If you are under the age of 13, please do not submit any personal information through the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide personal information through the Services without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us through the Websites or Services, please contact us at [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com), and we will use commercially reasonable efforts to delete that information.

### **OTHER WEBSITES**

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

### **CALIFORNIA PRIVACY RIGHTS**

We will not share any Personal Data with third-parties for their direct marketing purposes to the extent prohibited by California law. If our practices change, we will do so in accordance with applicable laws and will notify you in advance.

## **HOW TO CONTACT US**

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email: [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com)

Or write to us at Push Play Labs Inc., Privacy Officer, 101 South Park Street, San Francisco, CA 94107.

## **CHANGES TO THE POLICY**

If the Company makes any material changes or amendments to the Policy, the Company will post a notice on this website. Your continued use the Services constitutes your acceptance of all such changes and amendments. Your sole remedy is to cease using the Services.

Any questions regarding the Policy or personal data collection and other practices should be directed to [privacy@meetsidekick.com](mailto:privacy@meetsidekick.com).