



## BUDDY PRIVACY & COOKIE POLICY

Last updated May 22, 2023

### Welcome to Buddy

Buddy app is a social networking and location communication service that offers its services through mobile applications. When you use Buddy, we get some information from you, and we are upfront about what information we collect, how we use it, and who we share it with. We'll also tell you how you can access, update, and delete certain Information. This Privacy Policy will make it simple and help you do that.

This privacy notice applies to Buddy, Inc. ("**Company**," "**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our services ("**Services**"), such as when you:

- Visit our website at <http://www.buddytech.net>, or any website of ours that links to this privacy notice
- Download and use our mobile application (Buddy App), or any other application of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices, so please read this privacy policy in full. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, contact us at [buddy@buddytech.net](mailto:buddy@buddytech.net).

### TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW AND WHY DO WE PROCESS YOUR INFORMATION?
3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?
4. HOW DO WE HANDLE YOUR SOCIAL LOGINS?
5. HOW LONG DO WE KEEP YOUR INFORMATION?
6. HOW DO WE KEEP YOUR INFORMATION SAFE?
7. WHAT ARE YOUR PRIVACY RIGHTS?
8. CONTROLS FOR DO-NOT-TRACK FEATURES
9. DO VIRGINIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

10. DO WE MAKE UPDATES TO THIS NOTICE?  
11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

***In Short:** We collect personal information that you choose to provide to us to use the Buddy app.*

We collect personal information that you voluntarily provide to us when you register on the Buddy app and when you participate in activities on the app, or otherwise when you contact us at [buddy@buddytech.net](mailto:buddy@buddytech.net). All personal information that you provide to us must be true, complete, and accurate.

**Sensitive Information.** We do not process sensitive information.

**Age restrictions.** Buddy is designed for anyone above age 13. If we find out that we've collected a child's information without parental consent, we'll delete it. Parents with concerns should contact us.

**Profile Information.** We collect information you add to your profile, such as:

- Your first name,
- Phone number, and
- External social ID if you signed up with a social account and profile photo.

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, like Snapchat. If you choose to register in this way, we will collect the information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS?" below.

**Information you share on Buddy.** We have access to whatever information you send through Buddy, such as pins, and loops. When the pins and loops are deleted after 24 hours, they are also permanently deleted on the Buddy server unless you or a user decide to save the pin. The creator of the pin has the option to permanently delete the pin at any time. As a user, you also have the option to save a pin that your buddy has created, but if they choose to delete that pin, it is also deleted from your saved pins. Keep in mind that the other users you share information with can always save that content or copy it outside the Buddy app or website. So be mindful and use common sense regarding anything you share on the internet: Do not send messages or share content that you wouldn't want someone to save or share.

### Information we get when you use Buddy.

We collect information about how you use Buddy, pins you have created and saved, loops you have created and when you message someone. We collect information about

how you use Buddy and its features, including loops and pins, in order to continually improve your experience with Buddy. Buddy chats are encrypted and secure.

Below is a detailed explanation of the types of information we collect when you use Buddy and when you choose to provide us with access or permission:

**Usage information.** We collect information about how you use Buddy. For example, we may collect information about how you interact with our services, such as how many hours per day you use Buddy; how you communicate with your Buddies, such as their names, the time and date of your communications, the number of messages you exchange with your Buddies, and which Buddies you exchange messages with the most.

**Content information.** We collect content you create on our services, such as pins and loops, messages you send to Buddy's, and messages and images posted via Buddy chat. We also collect information about the content, like the time and date you sent a message and whether a Buddy has seen the message.

**Geolocation Information.** We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide certain location-based services, such as enabling the contacts you choose to be a Buddy or Best Buddy to share your location with them. 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. If you wish to change our access or permissions, you may do so at any time in your device's settings and within the Buddy app.

**Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's bluetooth, camera, contacts, social media accounts, storage, microphone, sms messages, photos, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

**Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application you accessed.

**Push Notifications.** We may request to send you push notifications regarding your account or certain features of the application, such as receiving a chat message from your Buddies, if a Buddy has shared a pin or a loop with you. If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings and within the Buddy app.

This information is primarily needed to maintain the security and operation of our application, for troubleshooting, and for our internal analytics and reporting purposes.

**When you become an ambassador.** If you want to become a Buddy Ambassador, we'll ask you for some more information about you and your Instagram username. We may also ask you to refer friends to become Ambassadors, but only friends that you have permission to refer.

**Information you share when you contact us.**

When you contact customer support or any of the Buddy app team, we'll collect the information you volunteer.

**Information automatically collected**

**In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services (i.e. the Buddy website or application).

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Notice (below).

The information we collect includes:

**Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use),

device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

**Cookie Notice: Information collected by cookies and other technologies.**

Like most websites and apps, 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 use third-party cookies that collect information about how you use our services over time and combine it with similar information from other services and companies. We use this information to understand things like popular features and popular times to use Buddy.

Most browsers are automatically set to accept cookies. If you prefer, you can usually remove or reject browser cookies through the settings on your browser or device. Some browsers may be set to send "do not track signals," but we currently don't respond to "do not track signals." Keep in mind that removing or rejecting cookies could affect Buddy's performance.

**Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

**Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

**Information we collect from third parties and other users.** We may collect information about you from other users. For example, if another user shares their contacts or events they plan on attending, we may combine information from that user's contact list and activities with other information we've collected about you.

## **2. HOW AND WHY DO WE PROCESS YOUR INFORMATION?**

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- To enable you to create and log in to your account, as well as keep your account in working order.
- To enable you to chat with your Buddies, to create and participate in Group chats.
- To communicate with you, by email. e.g, we may use email to respond to support inquiries or to share information about our products, services, and offers that we think may interest you.
- Creating anonymous data that we use for things like analytics.
- Personalizing your experience by, among other things, suggesting friends or customizing the content we show you.
- Enhancing the safety and security of our products and services.
- Verifying your identity to prevent fraud or other unauthorized or illegal activity.
- Using information we've collected from cookies and other technology to enhance our services, your experience with them, and identify usage trends and patterns.
- Enforcing our Terms of Service and other usage policies.
- We use location data to help better personalize your experience by suggesting Points of Interest.
- To send you marketing and promotional communications, and determine the effectiveness of those campaigns from Buddy or from our Partners you have opted into receiving in the Buddy app, which you can opt out of at any time in the Buddy app. For more information, see "WHAT ARE YOUR PRIVACY RIGHTS?" below.

**3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?**

***In Short:*** Buddy is designed to help you share information with others. As a result, we share some of the information generated through our platform publicly or with third parties. We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests. We may share information about you in the following ways:

**With other Buddy users.** We may share the information below with other Buddy users that you choose.

**Buddy is a safe space for users to connect and communicate.** There are strict community guidelines in place that we strongly encourage users to read and abide by. Please refer to our Terms and Conditions for more information on our Community Guidelines.

**Information about you, such as your username, name, and profile photo.**

**Content you post or send.** All of this content can be controlled in your account settings. You can learn more about your account settings under Control over Your Information.

**With a Social Networking Service (SNS).** When you use an SNS, like Snapchat, to sign up for Buddy, we share some information with that SNS. Make sure you read the SNS's privacy policies to learn how the SNS will use your information.

**With service providers.** We may share information about you with third-party service providers that help us run our business, like the company that helps us store our data. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services
- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Testing Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers

**With Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

**With third parties for legal reasons.** We may share information about you if we reasonably believe it's necessary to: comply with legal process, governmental request, or applicable law, rule, or regulation; investigate, remedy, or enforce potential Terms of Service violations; protect the rights, property, and safety of us, our users, or others; detect and resolve any fraud or security concerns.

**With third parties as part of a merger or acquisition.** If Buddy gets involved in a business transaction, like a merger, asset sale, financing, liquidation or bankruptcy, or acquisition, we may share your information as part of that transaction.

**De-identified data.** We may also share aggregated, non-personally identifiable, or de-identified information with third party entities on a case-by-case basis, sometimes for commercial purposes.

**Other Users.** When you share personal information or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. If you interact with other users of our Services and register for our Services through a social network (such as Snapchat), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.

#### **4. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

***In Short:** If you choose to register or log in to our Buddy app using a social media account, we may have access to certain information about you.*

Our Buddy app offers you the ability to register and log in using your third-party social media account details (like your Snapchat login). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

#### **5. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*



We store your basic account information—like your name, phone number, and email—for as long as you have an account with Buddy.

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it.

Buddy users may delete their account within the Buddy app at any time. If you ever decide that you don't want us to keep your information, you can just ask us to delete it.

When we delete any information, please remember it may still be in our archives. Keep in mind that in some cases we may not delete your information unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements), or to suspend our deletion practices, or if we receive reports of abuse or other Terms of Service violations. We may also keep certain information in backup for a limited time.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, 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.

## **6. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## **7. WHAT ARE YOUR PRIVACY RIGHTS?**

**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your

consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**Opting out of marketing and promotional communications:** Users can opt out of receiving marketing or promotional communications from Buddy, our Partners, or Sponsor profiles in the Buddy app by unfriending the Buddy, Partner, or Sponsor profiles, or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. You will then be removed from receiving further marketing notifications and messages in the Buddy app. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

**Account Information.** If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Please see our Cookie Policy and Log Information as stated above in this Privacy Policy.

If you have questions or comments about your privacy rights, you may email us at [buddy@buddytech.net](mailto:buddy@buddytech.net).

## **8. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 9. DO VIRGINIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of Virginia, you may be granted specific rights regarding access to and use of your personal information.*

### **Virginia CDPA Privacy Notice**

Under the Virginia Consumer Data Protection Act (CDPA):

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sale of personal data" means the exchange of personal data for monetary consideration.

If this definition "consumer" applies to you, we must adhere to certain rights and obligations regarding your personal data.

The information we collect, use, and disclose about you will vary depending on how you interact with Buddy, Inc. and our Services. To find out more, please refer to the following topics in our Privacy Policy:

- Personal data we collect
- How we use your personal data
- When and with whom we share your personal data

#### Your rights with respect to your personal data

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Buddy, Inc. has not sold any personal data to third parties for business or commercial purposes. Buddy, Inc. will not sell personal data in the future belonging to website visitors, users, and other consumers.

### Exercise your rights provided under the Virginia CDPA

More information about our data collection and sharing practices can be found in this privacy notice and our Cookie Notice.

You may contact us by email at [buddy@buddytech.net](mailto:buddy@buddytech.net) or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

### Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within fifteen (15) working days of receipt. The response period may be extended once by fifteen (15) additional days when reasonably necessary. We will inform you of any such extension within the initial 15-day response period, together with the reason for the extension.

### Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at [buddy@buddytech.net](mailto:buddy@buddytech.net). Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the [Attorney General to submit a complaint](#).

## **10. DO WE MAKE UPDATES TO THIS NOTICE?**

***In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at [buddy@buddytech.net](mailto:buddy@buddytech.net) or by post to:

Buddy Inc.  
Attn: Legal – Privacy  
2934 Beverly Glen.  
Bel Air, Los Angeles. 90077  
United States

## BUDDY PRIVACY POLICY SUPPLEMENT TO SUPPORT USERS IN THE UK OR EU

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  - Send users information about promotions from Buddy or our Partners
  - Develop and display personalized and relevant promotional content for our users

- Analyze how our Buddy app or website are used so we can improve them to engage and retain users
  - Support Buddy and/or our Partner's marketing activities
  - Diagnose problems and/or prevent fraudulent activities
  - Understand how our users use Buddy and our website so we can improve user experience
- 
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
  - **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" in Buddy's general privacy notice.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.