

Relola Inc. Privacy Policy

Effective Date: January 1, 2020

When you use Relola Inc. Sites, Apps, and Services, we understand that you're trusting us with your data and we have a responsibility to respect your privacy. We take that responsibility seriously. This policy explains what information we collect, why we do so, whom we share it with, and how we protect it. This policy also provides tools you can use to manage your privacy, including opting out of certain uses of your Personal Information (defined below).

Certain terms are used throughout this document:

- Relola Inc. is referred to as "Relola Inc.," "Relola," "Company," "we," "our," or "us."
- Relola's website, various web services, and mobile applications are collectively referred to as "Sites, Apps, and Services."

BY USING THE SITES, APPS, AND SERVICES, YOU ARE CONSENTING TO THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT US AT support@relola.com, 1-888.481.1269 (TOLL-FREE IN THE UNITED STATES), 1-510.879.7043 (INTERNATIONAL CALLS), OR VIA THE "CONTACT US" FORM ON THE BOTTOM OF OUR HOME PAGE, <https://home.relola.com/>.

Introduction

We offer a wide range of services. We know that everyone's Relola usage is different and reflects their personal and/or professional experience. We use information you give us, together with information we generate and information from other sources, to provide and optimize our services to you. We carefully evaluate how we use data to make sure that we're using your information to provide value **for you**.

We do not sell user data.

We may offer businesses and brands the option to sponsor certain Relola channels for a fee. Channel sponsors do not receive access to any user data that is not visible to regular channel members. They pay the fee not to gain access to user data, but to expose their brand and message to channel/map visitors.

Administrators and owners of any Relola channel of which you are a member may view your name and the email address that you use as your User ID. They may also see the content that you have submitted on that channel. They are bound to use that information only for the purpose of communicating among channel members for channel-related business.

Information collected by Relola

When you use our Sites, Apps, and Services, we collect a variety of information from and about you and your devices. Some of this information identifies you directly (like an email address) while some of it is associated with you through your account, profile, or device (like the posts you submit or comment on or your location data).

The kind of data we collect about you depends on how you use Relola. If you only use our Sites, Apps, and Services to view maps, posts, and content submitted by others, we'll have less information about you than if you create a channel, submit posts, or submit comments. Even if you don't have an account with us, we may still collect some data about you, like your IP address and other device information, when you browse our sites or use our apps.

Personal information

We collect information that personally identifies you, such as your name, address, phone number, email address, physical location data, payment information, and other personally identifiable information that you choose to provide us with ("**Personal Information**"). You may be asked to provide us with Personal Information when you register with the site or use any of our services, and at other times. We may receive Personal Information about you when others invite you to join their Relola groups/channels, or when you link your Relola account with your account(s) on social media platforms. We combine personal information we collect from you with personal information and other information we receive about you from third parties, such as our service providers (defined below) and social media platforms.

Credit card and banking information

Except in case of custom billing arrangements made between Relola and customers who request them, we do not store the bank account or charge card details that you use to pay Relola for subscriptions or other charges. Our payment processing service provider, Stripe (www.stripe.com), executes all of our non-custom subscription payment transactions and stores customer payment account information in encrypted form with industry-leading privacy and security standards. The information is used for billing and payment purposes only.

Usage data and site activity

We automatically collect information regarding the actions you take on the Sites, Apps, and Services (“**Usage Data**”). For example, each time you use the site we automatically collect the type of web browser you use, your operating system, your IP address, the pages you view, and the time and duration of your visits to the Site. We use this information to help us understand how people use our Sites, Apps, and Services, and to enhance them.

Cookies and anonymous identifiers

We use cookies (small text files placed on your computer to identify your computer and web browser) and may use anonymous identifiers (random strings of characters used for the same purposes as cookies). We use cookies and other anonymous identifiers to analyze use of and improve the Sites, Apps, and Services; to recognize returning site visitors; and as described in the Advertising and Online Tracking Section of this Privacy Policy. Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent, however, certain features of the Sites, Apps, and Services may not work if you delete or disable cookies. Some of our Service Providers (defined below) may use their own cookies, anonymous identifiers, or other tracking technology in connection with the services they perform on our behalf.

We use Google Analytics on the Sites, Apps, and Services to collect usage data and to analyze how users use the Sites, Apps, and Services. For more information about how to opt out of having your information used by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>.

Device information

Like other mobile apps, we collect data about the device you use with our app. The data we collect include device model and settings, operating system, unique identifiers, and the version of the app you’re using. We also collect data about how your device interacts with our services, including IP address, crash reports, and system activity. You can control our collection of such data by adjusting the privacy and security settings on your mobile device.

Location information

If you enable location services on your mobile device and use the Relola mobile app on that device, Relola collects the location of your device. We use that information to offer location-based features, like identifying your present position on Relola maps. If you don’t want to use these features, you can turn off location services on your device.

We also collect location information for similar purposes from your browser if you enable it. You can disable such access through your browser settings.

Social networks

If you use social media accounts (like Google and Facebook) to log in to Relola, we may access your social media profile information to enable the login to occur. We do not store your social media information for any promotional or advertising purposes. In addition, you can always limit what is shared by managing your social media service settings.

Why Relola uses your information

Communicating with you and connecting you with others

We use the contact information you provide us, like your phone number and email address, to communicate with you about our Sites, Apps, and Services. This includes things like responding to comments, questions, and requests you send us; and notifying you of service updates and changes. We may also inform you about our services, offers, promotions, news, and other updates we think may be of interest to you.

Personalizing your experience

We use the information we collect about you and your activity on our Sites, Apps, and Services to personalize the services we offer. For example, we will show you only those channels that you are a member of or have access to based on your account. We may notify you via email and/or in-application notifications of updates in channels in which you are a member, depending on how your Relola app notification preferences, device notification preferences, and the channel's notification preferences are configured.

Providing and improving our services

We use your information to provide our services to you. We also use your information to improve our existing services and develop new ones. For example, we track how you use our websites and apps and use that information to troubleshoot issues and make adjustments to improve your experience.

Other uses of your information

We also use your data to detect, investigate, and prevent fraudulent usage and other illegal activities and to protect the rights and property of Relola, its customers, and others.

Occasionally, there may be a reason we'd like to use your information in a way that isn't described here. If that happens, we'll let you know so you can decide whether you're comfortable with it.

We do not sell user data.

Sharing your information

We understand that sharing information with third parties is a big responsibility. We're committed to sharing information only when needed for a legitimate business or legal purpose, and then only with recipients who will protect it. We do not sell user data.

Information you ask us to share

We share information when you ask us to share it. For example, if you join a Relola channel, the administrator(s) of that channel can see your name, email address, and the date you joined the channel. If you do not wish to have your information shared as such, do not join Relola channels.

Service providers and business partners

From time to time, we may establish business relationships with other businesses whom we believe trustworthy and who have confirmed that their privacy practices are consistent with ours ("**Service Providers**"). For example, we may contract with Service Providers to provide data feeds, application hosting and maintenance, data storage and management, and marketing and promotions. We provide our Service Providers with only the information necessary for them to perform these services on our behalf. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, in order to protect your Personal Information from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information other than as specified by us.

Platform customers

Relola licenses its core technology platform to certain customers. Although we cannot control all the systems, applications, services, and usage scenarios that our customers implement with Relola technology, their access to your Relola user data is consistent with all the provisions of this document.

Advertising and Online tracking

We may allow third-party companies to serve ads and collect certain anonymous information when you visit the Sites, Apps, and Services. These companies may use non-personally identifiable information (e.g. click stream information, web browser type, time and date, subject of advertisements clicked or scrolled over) during your visits to the Sites, Apps, and Services and other websites to provide advertisements about goods and services likely to be of interest to you. These companies typically use a cookie to collect this information. Our systems do not recognize browser “Do Not Track” signals, but several of our Service Providers who utilize these cookies on our Site enable you to opt out of targeted advertising practices. To learn more about these advertising practices or to opt out of this type of advertising, you can visit www.networkadvertising.org or www.aboutads.info/choices/.

Legal and Compliance Transfers

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property, or rights of Relola or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

Other transfers

We may share Personal Information and Usage Data with businesses controlling, controlled by, or under common control with Relola. If Relola is merged, acquired, or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information and Usage Data in connection with such transaction. You will have the opportunity to opt out of any such transfer if, in our discretion, it will result in the handling of your Personal Information in a way that differs materially from this Privacy Policy.

Privacy tools and choices

Accessing and deleting your information

If you'd like a copy of the data we've collected about you, please contact us at support@relola.com, 1-888.481.1269 (toll-free in the United States), 1-510.879.7043 (international calls), or via the "Contact Us" form on the bottom of our home page, <https://home.relola.com/>. We can also delete all or any subset of your data on your request.

We offer these options for your benefit and we will never discriminate against you for exercising them. But if you choose to delete your data or close your account, we won't be able to offer you services that require us to use your data.

Please note that most of the user generated content that appears on our Sites, Apps, and Services is stored and controlled by third party providers; thus, we may be unable to fully confirm the removal of the data from their servers even if it is no longer visible on our Sites, Apps, and Services.

Advertising network preferences

Relola may arrange with third-party ad servers, ad network providers, and/or third-party advertisers to provide ad content appearing on our Sites, Apps, and Services. To measure how effective those ads are and to make them more relevant, ad providers may use their own tracking technologies to collect your information. These are used to record users' activity, such as pages visited, and to learn what types of information are of most interest to the users. For more information regarding the choices you have about these technologies (such as opting out), visit the [Network Advertising Initiative](#), [Digital Advertising Alliance](#), [Omniture](#), and [PrivacyChoice](#).

Managing communications preferences

Email subscriptions

Relola may send you email for a variety of reasons, including marketing. You are welcome to unsubscribe or change your Relola marketing email subscriptions. To do so, click the "Unsubscribe" or "Manage preferences" link at the bottom of any marketing message that we send you.

Note that certain types of email messages that we send are integral to how our products function (for example, user account email address verification messages, password-reset messages, etc.). These kinds of messages (generally called "transactional email") are excluded from the scope of unsubscribe requests and may continue to be sent to you when relevant based on certain functional triggers on our platform, even if you unsubscribe from other Relola distribution lists, unless/until you deactivate your Relola account.

Be careful when you share information with others

Please be aware that whenever you include information in your public profile on the Sites, Apps, and Services, or when you share information in any public area of the Sites, Apps, and Services, that information can be accessed by others. Anyone with access to such information can potentially use it for any purpose. Relola has no means of restricting how third parties use such information.

Information Security

We understand that no matter how we collect your information, we have a responsibility to protect it. We take that responsibility seriously. We maintain physical, electronic, and procedural safeguards to protect the confidentiality and security of all of the information transmitted to and gathered by us. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through the Sites, Apps, and Services, we cannot and do not guarantee the security of any information you transmit on or through the Sites, Apps, and Services, and you do so at your own risk. If we learn of any security or confidentiality breaches related to your data, we'll let you know as soon as we can and try our best to address the issues.

Third party websites and social media platforms

Our Sites, Apps, and Services may contain links to and from other websites or allow you to share content on third party websites or social media platforms, such as Facebook and Twitter. A link to a third party's website or social media platform does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third party websites or social media platforms; you access such third-party websites and social media platforms at your own risk. You should always read the privacy policy of a third-party website or social media platform before sharing any information on or with them.

Children's privacy

The Sites, Apps, and Services are intended for users who are 13 years old or older. We do not knowingly collect Personal Information from children under the age of 13. If we become aware that

we have inadvertently received Personal Information from a child under the age of 13, we will delete such information from our records. Users of any age, or the parents or guardians of minors, may request the removal of their or their children's content or information publicly posted on our Sites, Apps, and Services by contacting us at support@relola.com, 1-888.481.1269 (toll-free in the United States), 1-510.879.7043 (international calls), or via the "Contact Us" form on the bottom of our home page, <https://home.relola.com/>. Please note that most of the user generated content that appears on our Sites, Apps, and Services is stored by third party providers; thus, we may be unable to fully confirm the removal of the data from their servers even if it is no longer visible on our Sites, Apps, and Services.

Processing in the United States

Please be aware that your Personal Information and communications may be transferred to and maintained on servers or databases located outside your state, province, or country. Please be advised that we process and store all information in the United States. The laws in the United States may be more or less protective of your privacy than those in other nations. By using the Sites, Apps, and Services, you are agreeing that the collection, use, transfer, and disclosure of your Personal Information and communications will be governed by the applicable laws of the United States.

Applicability of this policy

This policy applies to every site, app, and service of ours that links to it.

Our Sites, Apps, and Services may link to other companies' websites. Some features may also involve the sharing of your information with third-party websites. These third-party websites may collect information about users on those websites. Relola doesn't control those sites, and this privacy policy does not apply to these external websites and third parties.

Legal Disclosures

In this section, we've provided some disclosures required under state privacy laws. There shouldn't be anything surprising in this section, and we've tried to explain our privacy practices in plain English throughout the rest of the policy.

Under the California Consumer Privacy Act or CCPA, California residents have certain rights regarding their data, including:

- The right to know the categories of personal information we’ve collected and the categories of sources from which we got the information (see “Information collected by Relola” above, and the chart just below)
- The right to know the business purposes for sharing personal information (see “Why Relola uses your information” above)
- The right to know the categories of third parties with whom we’ve shared personal information (see “Sharing your information” above)
- The right to access the specific pieces of personal information we’ve collected and the right to delete your information (see “Privacy tools and choices” above)

California residents also have the right to not be discriminated against if they choose to exercise their privacy rights.

We believe that all our users should enjoy the same rights as those located in California, so this policy and the tools and choices it describes pertain to all Relola users, regardless of their location.

Categories of Personal Information under the California Consumer Privacy Act

<u>Category and sources of Information</u>	<u>How we use it</u>	<u>Types of individuals affected</u>	<u>How we share it</u>
Identifiers We collect this information from our users and customers. We also generate identifiers internally.	To enable use of our Sites, Apps, and Services; to communicate with you; to understand how our users interact with our sites; and to improve our offerings	People who use our sites and services or create a user account	We share this data with our service providers
Personal information under California Civil Code section 1798.80 We collect this information from our users and customers.	To enable use of our Sites, Apps, and Services; to communicate with you; to understand how our users interact with our sites; and to improve our offerings	People who create a user account	We share this data with our service providers
Protected classifications	We don’t collect such data	None	None

<p>Commercial information</p> <p>We collect this information from our customers, and generate it internally during transactions with our customers</p>	<p>To transact with you if you subscribe to our services</p>	<p>People and businesses who subscribe to our services, purchase advertising, or sponsor our channels</p>	<p>We share this data with our service providers and with business partners, including those to whom you instruct us to send this information</p>
<p>Biometric information</p>	<p>We don't collect such data</p>	<p>None</p>	<p>None</p>
<p>Electronic network activity information</p> <p>We collect this information from our users and customers</p>	<p>To enable use of our Sites, Apps, and Services; to communicate with you; to understand how our users interact with our Sites, Apps, and Services; and to improve our offerings</p>	<p>People who use our Sites, Apps, and Services</p>	<p>We share this data with our service providers and with business partners, including those to whom you instruct us to send this information</p>
<p>Geolocation data</p> <p>We collect this information from our users and customers</p>	<p>To enable use of our Sites, Apps, and Services; to understand how our users interact with our sites; and to improve our offerings</p>	<p>People who use our sites or mobile applications and allow us to collect their location data, or who submit Relola user generated content containing location data</p>	<p>We share this data with our service providers and the administrators and owners of Relola channels that have "Asset Tracking" or "Geo-Fencing" features turned on</p>
<p>Audio, video, and photographic information</p> <p>We collect this information from our users and customers</p>	<p>To display user-generated content</p>	<p>People who submit such content on our Sites, Apps, and Services</p>	<p>We share this data with our service providers and display it to anyone who has access to view the Relola channel(s) to which the user generated content was submitted</p>
<p>Professional or employment-related information</p> <p>We collect this information from our commercial/business customers if they think it's relevant to provide or necessary in building the</p>	<p>To provide services our business customers requested</p>	<p>People who use our Sites, Apps, and Services as employees of business/commercial customers of Relola</p>	<p>We share this data with our service providers</p>

member list of a business channel			
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Contacting Relola

If you have any questions about this privacy policy or our privacy practices, please contact us at support@relola.com, 1-888.481.1269 (toll-free in the United States), 1-510.879.7043 (international calls), or via the “Contact Us” form on the bottom of our home page, <https://home.relola.com/>.

Changes to this policy

We frequently review our privacy practices to make sure they comply with this policy. Sometimes, we’ll update the policy to reflect changes in our products, technology, practices, and uses of data. The date of this policy’s most recent revision is marked at the top of the policy document. **Please print a copy of this privacy policy for you records and please check <https://home.relola.com/privacy> frequently for any changes.**