

KWIPSHARE, INC.

PRIVACY POLICY

Effective September 18, 2018

At KwipShare, Inc. (the “Company”), your privacy is very important to us. The purpose of this privacy policy (this “Policy”) is to provide you with a description of the types of information we collect about you when you visit the Company web site located at www.kwipshare.com, or any other website that the Company operates, and associated sub-domains (the “Site”) and/or access the services of the Company that you have registered to use (the “Services”), and how we use that information. This Policy only applies to information collected while you are on the Site or accessing the Services.

Information We Collect. We collect and store information that you voluntarily provide to us as well as data related to your Site visit and use of the Services. We may request that you provide personally identifiable information, including your name, title, company name, email address, phone number and other information from which your identity is or may be discernible. The information we collect may be stored on our servers, and on the servers of third party service providers. In addition, we automatically collect certain aggregate information and analytical data related to your Site visit usage and use of the Services (see “Use of Cookies” below). Aggregate information is non-personally identifiable or anonymous information about you, and may include the date and time of your visit, the IP address of your computer or mobile device, your computer or mobile device browser information, the Internet address that you visited prior to and after reaching the Site or Service, the name of the domain and host you used to access the Internet, the type of mobile device you use, your mobile device’s unique device ID and the features of our Site and Service which you accessed. This data is not associated with your personally identifiable information.

How We Use Information. We use collected information to make available and to improve our high standard of reliable services. We use such information to:

- respond to inquiries and monitor such responses;
- provide information about and market our products or services and third party services;
- analyze visitors’ access to and use of the Site and the Services;
- resolve problems; and
- improve and manage the Site and the Services.

If you have any questions regarding the foregoing, or our privacy practices, you may contact at support@kwipshare.com.

Disclosure of Information. We do not sell or rent personally identifiable information to third parties who are not affiliates of the Company, except as described here. We may disclose

personally identifiable information to appropriate affiliates of the Company, including strategic alliance affiliates and third party service providers, to respond to a request for service or to provide information about available products or services, including third party services and products. We are not limited in our use of non-personal information that does not permit direct association with any specific individual, or non-identifiable aggregate information about our users (such as the number of users of our services, the geographic distribution of our users, the amount of information located and/or removed, etc.). We disclose information that we, in good faith, believe is appropriate to cooperate in investigations of fraud or other illegal activity. We disclose information in response to a subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action. We may disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you). We share information with companies that provide public relations and marketing services for us. As with any other business, it is possible that in the future we could merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to the information maintained by us, including customer account information, but would continue to be bound by this Policy unless and until it is amended. We share your information with our parent, subsidiaries and joint ventures to help coordinate any service we provide to you, enforce our terms and conditions, and promote trust and safety. We may share aggregate (non-personally identifiable) information with certain third parties such as advertisers, national industry organizations, and prospective affiliates.

Choice and Opt-Out. We provide you with the opportunity to “opt-out” of having your personally identifiable information used for certain purposes when we ask for this information. For example, if you do not wish to receive marketing material from us, you can indicate your preference by clicking a link to unsubscribe contained in such communications. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

General Data Protection Regulation (“GDPR”) Compliance. The Company’s Site and Services are operated in the United States. If you are a resident of or are located in the European Economic Area (“EEA”), you may also have certain rights under the GDPR regarding the use and transfer of your personal data. If you are located in the EEA or elsewhere outside the United States, any information that you provide, including your personal information, to the Company in connection with your use of the Site or the Services will be transferred to the United States. We may also transfer your personal information to third parties acting on our behalf for the purposes of data processing, storage, maintenance and improvements to the Site and Services. By providing any information to us, you consent to the transfer, processing and storage of such information in the United States. In general, under the GDPR, you may:

- request access to your personal data;
- have incomplete or incorrect data corrected;
- have your personal data deleted;

- suspend or restrict our use of your personal data, or withdraw your consent for us to use your personal data; and
- request a copy of your personal data.

Should you request a copy of your personal data, we will supply you with the first copy free of charge, but additional copies may be subject to a reasonable fee. Should you request the deletion of your personal data, we will take commercially reasonable steps to do so as soon as practicable, although your right to have your personal data deleted is subject to exceptions, such as, for example, compliance with a legal obligation or for the establishment, exercise or defense of legal claims.

Use of Cookies. “Cookies” are simple text files stored on your computer for use by a browser. Certain Site or Service features may only be available through the placement of a cookie. We may use “cookies” to assist in data collection and to track visitor Site and Services usage and trends to help us better serve you. The use of cookies is a standard practice among Internet web sites; most Internet browsers permit a user to accept, decline or delete cookies. We may use persistent cookies to make it easier for you to navigate the Site and our Services. Specifically, we may use persistent cookies to track whether you are logged into the Site or our Services. A persistent cookie may remain on your local device for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser’s “help” file. We may set a persistent cookie to store how you came to the Site and what items you interact with. Persistent cookies also enable tracking and targeting the interests of our users to enhance their experience on the Site. If you reject cookies, you will still be able to view the Site, but your ability to use some areas of the Site may be limited. Some of our business partners (e.g., analytical tracking software providers) may use cookies and tracking technologies on the Site. We have no access to or control over these cookies or tracking technologies. This Policy covers the use of cookies on the Site by us only, and does not cover the use of cookies or tracking technologies by any such business partner.

Data Security. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the Internet, or method of electronic storage, is 100% secure and we cannot guarantee its absolute security. In the event of an inadvertent disclosure of your personal information we will take commercially reasonable steps to limit and remedy the disclosure as required by applicable law. If you have any questions about the security of our Site and the Services, you can contact us via email at support@kwipshare.com.

Data Retention. We will retain personal information about you for the period necessary to perform the Services for you and for the purposes outlined in this Policy, unless a longer retention period is required by law and/or regulations. Notwithstanding this, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.

Age Limitation. This Site and the Services are not directed to persons under the age of 18. If you become aware that your child has provided us with personal information without your consent, please contact us at support@kwipshare.com or FIND-A-SHARE (346-327-4273). We do not knowingly collect or solicit information from, market to or accept services from persons under 18 years old. If we become aware that a person under 18 has provided us with personal information, we take steps to remove such information.

Effective Date; Policy Changes. Each time you use the Site and our Services, the current version of the Policy will apply. Accordingly, when you use the Site or our Services, you should check the date of this Policy (which appears at the top of the Policy) and review any changes since the last version. Our business changes frequently and this Policy is subject to change from time to time. You are encouraged to check the Site regularly for any changes to this Privacy Policy. Unless stated otherwise, our current Policy applies to all information that we have about you. We will not materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

Governing Law. This Policy is governed by the laws of the Commonwealth of Massachusetts, U.S.A. without giving effect to any principles of conflict of law.

Your California Privacy Rights. California Civil Code Section 1798.83 permits customers who are California residents and who have provided the Company 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 issue, please contact us at support@kwipshare.co or FIND-A-SHARE (346-327-4273).

Contact Us. To contact us with your questions or comments regarding this Policy or the information collection and dissemination practices of the Site, please email us at support@kwipshare.com or call FIND-A-SHARE (346-327-4273).