

**GiftPass**  
**Privacy Policy**

Effective Date: July 6, 2022

This Online Privacy Policy applies to information about you that GiftPass App Inc. (“GiftPass,” “we,” or “us”) may obtain about you when you visit [www.giftpassapp.com](http://www.giftpassapp.com) or use our applications or services (collectively, the “Services”). This Privacy Policy also describes how we may collect, use, or share information about you; your choices regarding our use of your information; the ways in which we safeguard the information we collect; and how you may contact us regarding our privacy practices.

**Information We Collect**

*Information You Provide to Us*

We obtain information that you provide to us directly, for example, data you submit when you create an account or book a demo. The information we collect may include personal information such as your name, email address, phone number, and date of birth. In some cases we also may request driver’s license or State ID card information or a Social Security number to authenticate a user’s identity in conjunction with certain transactions.

*Information That is Collected Automatically When You Use the Services*

In addition to information you submit to us, we may collect certain information using automated means such as cookies, web beacons, and web server logs. The types of information we collect automatically may include IP addresses, device identifiers, browser characteristics, operating system details, language preferences, referring URLs, length of visits, and pages viewed.

In addition, when you use our mobile application we may collect certain information that your mobile device captures during normal usage, such as motion-generated or orientation-generated mobile sensor data that your mobile device uses for various features. For example, when you turn your phone and the screen reorients itself based on the way you’re holding it, or when you shake your phone to trigger a particular action.

We may combine certain automatically-collected information with other information we obtain about you.

*Data Analytics*

We also may use third-party web analytics services, such as Google Analytics. These service providers help us understand our audience and analyze how visitors use the Services. To learn more about how Google may use information collected through the Services, [click here](#). To learn more about opting out of data collection through Google Analytics, [click here](#).

Your web browser may have settings that allow you to transmit a “Do Not Track” signal when you visit various websites or use online services. Like many websites and online services, our Services are not designed to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, you may wish to visit <http://www.allaboutdnt.com/>.

*Location Information*

When you use our mobile applications, we may collect, use, and share precise location data about you to provide and improve our location-based products and services. Where available, location-based services may use technologies such as GPS, Bluetooth, crowd-sourced Wi-Fi hotspots, and cell tower locations to determine a mobile device's approximate location. You may use your device settings to restrict this type of location tracking generally, and/or to prevent a particular app from obtaining location data about your device in connection with the use of that app.

### **How We May Use Your Information**

We may use the information we collect about you for various purposes, including to:

- Personalize and improve your online experience;
- Respond to emails or other requests, inquiries, comments, or questions;
- Provide customer support;
- Present you with offers tailored to your interests and past activities or usage of the Services;
- Monitor and analyze trends, usage, and activities of visitors to, and users of, the Services;
- Improve the Services, our marketing, and products or services we may offer;
- Contact you regarding your use of the Services or, in our discretion, changes to our policies;
- Verify and/or authenticate a user's identity;
- Provide users with information that we believe may be useful to them, such as information about products or services offered by us or by others;
- Prevent fraud or other misuse of the Services, including protecting our rights and the rights of affiliates or related third parties;
- Maintain records of our transactions and communications;
- Comply with applicable laws, regulations, or legal process as well as industry standards and our company policies;
- Prevent, investigate, identify, or take any other action with regard to any suspected or actual fraudulent or illegal activity or any activity that violates our Terms of Use; or
- For any other purpose, with your consent.

We also may use the information we obtain about you in other ways for which we provide notice at the time of collection.

In addition, we use information collected online through cookies, web beacons, and other automated means for purposes such as recognizing your browsing device when you visit the Services, tracking your activity as you navigate the Services, or analyzing your use of the Services. This information may be used to track your activity over time on various websites and services, as well as across different devices you may use to access the Internet and our Services.

### **How We May Share Information**

We may permit our agents, vendors, consultants, and other service providers to access information we collect about you through the Services to carry out work on our behalf. We also may use outside companies to help us send emails or text messages and manage email or text message campaigns, manage our careers page, or host or operate the Services. These third party service providers use the personal information to which they have access to carry out the purposes for which we shared the information.

We also may share your information: (1) if we are required to do so by law, regulation, or legal process (such as in response to a court order or subpoena or similar government request for information); (2) to fulfill requests by government agencies, including law enforcement authorities; (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity; (4) to enforce our policies, or to protect legal rights, property, or safety; (5) with third parties, to investigate or address possible criminal or fraudulent activity; or (6) in the event of a joint venture, partnership, merger, or other collaboration with another organization.

We reserve the right to transfer any information we obtain through the Services in the event we sell or transfer all or a portion of our business or assets (e.g., further to a merger, reorganization, liquidation, or any other business transaction, including negotiations of such transactions).

### **Information Security**

We maintain appropriate administrative, technical, and physical safeguards designed to help protect personal information collected or received through the Services. Although we use reasonable efforts to safeguard information, transmission via the Internet is not completely secure and we cannot guarantee the security of your information collected through the Services.

### **Links to Other Websites**

The Services may include links to other websites for your convenience and information. Websites that are operated by entities not affiliated with GiftPass may have their own privacy policies or notices, which we strongly suggest you review. GiftPass is not responsible for the content or privacy practices of any linked websites that we do not control.

### **Social Features**

The Services may include features that are designed to permit interactions that you initiate between the Services and third party websites or services, including third party social networks (“Social Features”). Examples of Social Features include enabling you to “like” or “share” our content on other websites or services; make comments on certain pages using a plugin; or to transmit content to the Services from your account on a third party website or service.

If you use Social Features on the Services, both GiftPass App, Inc. and the third-party service that operates the Social Features may have access to certain information about you and your use of both the Services and theirs. The information we collect in connection with Social Features is subject to this Privacy Policy. The information collected and stored by the third parties remains subject to those third parties’ privacy practices, including whether the third parties continue to share information with us, the types of information shared, and your choices with regard to what is visible to others on those third party websites or services.

### **Children’s Privacy**

The Services are not intended for, nor targeted to, children under 13, and we do not knowingly or intentionally collect information from children under 13. If we learn that we have received information

directly from a child who is under the age of 13, we will delete the information in accordance with applicable law.

### **California Privacy Rights**

California law permits customers in California to request certain details about how their “personal information” (as defined by California Civil Code Section 1798.83) is shared with third parties for direct marketing purposes. Under the law, a business must either provide this information or permit California customers to opt in to, or opt out of, this type of sharing. View our California Consumer Privacy Notice [here](#).

### **Your Choices**

You may unsubscribe from receiving promotional emails from us by following the instructions provided in those email communications. Please note that even if you opt out of receiving promotional communications from us, we may continue to send you non-promotional emails, such as communications regarding our ongoing relationship with you.

Many web browsers provide options to allow you to stop accepting new cookies, or to disable existing cookies. Please be aware that if you disable the cookies on your device, you may not be able to use certain features of the Services or other websites. In addition, disabling cookies may invalidate opt outs that use cookies to recognize devices that have opted out.

### **Information for Users Outside the United States**

As set forth in our Terms of Use, GiftPass is intended only for use in the United States. If you happen to be visiting us from outside the United States, please be aware that information we collect will be transferred to and stored on our servers in the United States. By using the Services, you acknowledge and consent to the transfer and processing of your personal data in the United States as described in this Privacy Policy. Please be aware that the data protection laws and regulations applicable to your personal data transferred to the United States may be different from the laws in your country of residence.

### **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy. We encourage you to review this Privacy Policy whenever you visit the Services to stay informed about our information practices.

### **How to Contact Us**

If you have questions regarding this Privacy Policy you may email us at [contactus@giftpassapp.com](mailto:contactus@giftpassapp.com).