

Whazzup Privacy Policy

Effective November, 2020.

We want you to understand how and why Locke Ventures, LLC. dba Whazzup (“Whazzup,” “we” or “us”) collects, uses, and shares information about you when you use our sites, mobile apps, widgets, and other online products and services (collectively, the “Services”) or when you otherwise interact with us or receive a communication from us. This Privacy Policy applies to all of our Services.

What We Collect (and How it is Used and Shared)

Information You Provide to Us

We collect information you provide to us directly when you use the Services. This includes:

<i>Account information</i>	When you create a Whazzup account, we require you to provide a username and password. Your username is public, and it doesn’t have to be related to your real name. You may also provide other account information, like a bio, or profile picture. We also store your user account preferences and settings.
<i>Content you submit</i>	We collect the content you submit to the Services. This includes your posts and comments, and other communications with us. Your content may include text, links, images, gifs.
<i>Actions you take</i>	We collect information about the actions you take when using the Services. This includes your interactions with content. It also includes your interactions with other users, such as blocking.

Information We Collect Automatically

When you access or use our Services, we may also automatically collect information about you. This includes:

Log and usage data We may log information when you access and use the Services. This may include your IP address, user-agent string, browser type, operating system, referral URLs, device information (e.g., device IDs), device settings, pages visited, links clicked, the requested URL, and search terms.

Location information We receive and process information about your location. For example, with your consent, we collect information about the specific location of your mobile device (for example, by using GPS or Bluetooth). We may also receive location information from you when you choose to share such information on our Services, including by associating your content with a location, or we may derive your approximate location from other information about you, including your IP address.

We use information about you to:

- Provide, maintain, and improve the Services;
- Research and develop new services;
- Help protect the safety of Whazzup and our users, which includes blocking suspected spammers, addressing abuse, and enforcing the Whazzup User Agreement and our other policies;
- Send you technical notices, updates, security alerts, invoices, and other support and administrative messages;
- Provide customer service;
- Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you;
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Measure the effectiveness of ads shown on our Services; and
- Personalize the Services, and provide and optimize advertisements, content, and features that match user profiles or interests.

Much of the information on the Services is public and accessible to everyone, even without an account. By using the Services, you are directing us to share this information publicly and freely.

When you submit content (including a post, comment, or chat message) to a public part of the Services, any visitors to and users of our Services will be able to see that content, the username associated with the content, and the date and time you originally submitted the content. Whazzup also allows third parties to access public Whazzup content via the Whazzup API and other similar technologies. Although some parts of the Services may be private or quarantined, they may become public and you should take that into consideration before posting to the Services.

Your Whazzup account has a profile page that is public. Your profile contains information about your activities on the Services, such as your username.

We offer social sharing features that let you share content or actions you take on our Services with other media. Your use of these features enables the sharing of certain information with your friends or the public, depending on the settings you establish with the third party that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the third parties that provide these social sharing features (e.g., [Tumblr](#), [Facebook](#), and [Twitter](#)).

Whazzup only shares nonpublic information about you in the following ways. We do not sell this information.

- *With your consent.* We may share information about you with your consent or at your direction.
- *With linked services.* If you link your Whazzup account with a third-party service, Whazzup will share the information you authorize with that third-party service. You can control this sharing as described in "Your Choices" below.
- *With our service providers.* We may share information with vendors, consultants, and other service providers who need access to such information to carry out work for us. Their use of personal data will be subject to appropriate confidentiality and security measures. A few examples: (i) payment processors who process transactions on our behalf, (ii) cloud providers who host our data and our services, (iii) third-party ads measurement providers who help us and advertisers measure the performance of ads shown on our Services.
- *To comply with the law.* We may share information in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process, or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, we will attempt to provide you with prior notice before disclosing your information in response to such a request.
- *In an emergency.* We may share information if we believe it's necessary to prevent imminent and serious bodily harm to a person.
- *To enforce our policies and rights.* We may share information if we believe your actions are inconsistent with our User Agreement, or other Whazzup policies, or to protect the rights, property, and safety of ourselves and others.

- *With our affiliates.* We may share information between and among Whazzup, and any of our parents, affiliates, subsidiaries, and other companies under common control and ownership.
- *Aggregated or de-identified information.* We may share information about you that has been aggregated or anonymized such that it cannot reasonably be used to identify you.

How We Protect Your Information

We take measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. For example, we use HTTPS while information is being transmitted. We also enforce technical and administrative access controls to limit which of our employees have access to nonpublic personal information.

You can help maintain the security of your account by configuring two-factor authentication.

We store the information we collect for as long as it is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.

Your Rights

Data Subject and Consumer Information Requests

Requests for a copy of the information Whazzup has about your account—including EU General Data Protection Regulation (GDPR) data subject access requests and California Consumer Privacy Act (CCPA) consumer information requests.

All other data subject and consumer requests under data protection laws should be sent via email to Whazzupdatarequests@whazzup.co from the email address that you have verified with your Whazzup account.

Before we process a request from you about your personal information, we need to verify the request via your access to your Whazzup account or to a verified email address associated with your Whazzup account. You may also designate an authorized agent to exercise these rights on your behalf. Whazzup does not discriminate against users for exercising their rights under data protection laws to make requests regarding their personal information.

Additional Information for California Users

The California Consumer Privacy Act (“CCPA”) requires us to provide California residents with some additional information about the categories of personal information we collect and share, where we get that personal information, and how and why we use it.

In the last 12 months, we collected the following categories of personal information from California residents, depending on the Services used:

- Identifiers, like your Whazzup username, email address, IP address, and cookie information.
- Commercial information, including information about transactions you undertake with us.
- Internet or other electronic network activity information, such as information about your activity on our Services and limited information about your activity on the services of advertisers who use our advertising technology.
- Geolocation information based on your IP address, or more specific location information if you authorize your device to provide it to us.
- Audiovisual information in pictures, audio, or video content submitted to Whazzup.
- Professional or employment-related information or demographic information, but only if you explicitly provide it to us, such as by applying for a job or filling out a survey.
- Inferences we make based on other collected data, for purposes such as recommending content, advertising, and analytics.

You can find more information about (a) what we collect and sources of that information, (b) the business and commercial purposes for collecting that information, and (c) the categories of third parties with whom we share that information in the “What We Collect (and How it is Used and Shared)” section above.

If you are a California resident, you have additional rights under the CCPA, including the right to request access to or deletion of your personal information, and information about our data practices, as well as the right not to be discriminated against for exercising your privacy rights. These rights can be exercised as described in the Data Subject and Consumer Information Requests section above.

Children

Children under the age of 13 are not allowed to create an account or otherwise use the Services. Additionally, if you are in the EEA, you must be over the age required by the laws of your country to

create an account or otherwise use the Services, or we need to have obtained verifiable consent from your parent or legal guardian.

Changes to This Policy

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. If the changes, in our sole discretion, are material, we may also notify you by sending an email to the address associated with your account (if you have chosen to provide an email address) or by otherwise providing notice through our Services. We encourage you to review the Privacy Policy whenever you access or use our Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. By continuing to use our Services after Privacy Policy changes go into effect, you agree to be bound by the revised policy.

Contact Us

To send a GDPR data subject request or CCPA consumer request, follow the steps in the “Your Rights - Data Subject and Consumer Information Requests” section above.

If you have other questions about this Privacy Policy, please contact us at legal@whazzup.co.