

PASSANT PRIVACY POLICY

Passant, LLC (“Passant,” “we,” “our,” or “us”) is committed to protecting your privacy. This Privacy Policy explains how your personal information is collected, used and disclosed by Passant. This Privacy Policy applies to our website, <http://onpassant.com> and our mobile app (collectively, our “Service”). By accessing or using our Service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy and our Terms of Service.

1. WHAT INFORMATION DO WE COLLECT AND FOR WHAT PURPOSE?

The categories of information we collect can include:

- **Information you provide to us directly.** We may collect personal information, such as your name, phone number, location, and e-mail address when you when you sign up for our mailing list or otherwise communicate with us. We may also collect any communications between you and Passant and any other information you provide to Passant.
- **Data collected through the use of the Service.** We collect information about how you use the Service, your actions on the Service, and content you post to the Service, including your interaction with your friends and with others on the Service, and any content you provide through comments or other functionality (“User Content”). Please remember that Passant may, but has no obligation to, monitor, record, and store User Content in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, or to protect and defend our rights and property. By using the Service, you consent to the recording, storage and disclosure of such communications you send or receive for these purposes.
- **Information we collect from social networks.** When you interact with our Service through various social media, such as when you login through Facebook or Instagram, or when you follow Passant or share Passant content on Facebook, Twitter, Pinterest, Instagram or other sites, we may receive information from those social networks including your profile information, picture, user ID associated with your social media account, friends list, and any other information you permit the social network to share with third parties. We may use information about your connections on social media to let you know what your friends are doing on our Service, and to let your friends know what you are doing on the Service, and we may use it to suggest new friends you may want to connect with. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.
- **Address Book Information.** With your permission, Passant may access your contact list available on your mobile device so that you can locate your friends and contacts on the Service and invite your friends and contacts to connect with our Service. When we send the invitation to you to join the Service, we will include your name and photo to let them know that you are the person extending the invitation. After sending these invitations, we may also send reminder emails to your invitees on your behalf, which may also include your name and photo. We will not use the information contained in your Address Book for any purpose other than to send invitations to your contacts at your request.
- **Location Information.** We collect your unique user identifier and your location through GPS, WiFi, or wireless network triangulation in order to obtain your location for the purposes of providing our Service. We maintain location information only so long as is reasonable to provide the Service and then delete location data tied to your personal information. We may maintain de-identified location data for a longer period of time in order to analyze aggregate trends and metrics. If you want to opt-out of the collection of your GPS or WiFi data from your mobile device, please adjust your Settings in your mobile device to limit the app’s access to your location data. Please see “Control Over Your Information” below to learn more.

We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages and push notifications, and permit you to communicate with others on the Service or on social media or invite others to join the Service. We may also send you Service-related emails or messages (e.g., account verification, change or updates to features of the Service, technical and security notices). For more information about your communication preferences, see “Control Over Your Information” below.

2. HOW WE USE COOKIES AND OTHER TRACKING TECHNOLOGY TO COLLECT INFORMATION.

We, and our third party partners, automatically collect certain types of usage information when you visit our Service, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, file information and similar technology (collectively, “tracking technologies”). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account, and other such information. We also collect information about the way you use our Service, for example, the site from which you came and the site to which you are going when you leave our website, the pages you visit, the links you click, how frequently you access the Service, whether you open emails or click the links contained in emails, whether you access the Service from multiple devices, and other actions you take on the Service. When you access our Service from a mobile device, we may collect unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers (“IDFA”), Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g., latitude and/or longitude) or similar information regarding the location of your mobile device, or we may be able to approximate a device’s location by analyzing other information, like an IP address. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service and to understand more about the demographics of our users. We may also work with third party partners to employ technologies, including the application of statistical modeling tools, which attempt to recognize you across multiple devices. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our Service; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Service.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

We and our third party partners may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see “Third Party Tracking and Online Advertising” below.

3. SHARING OF YOUR INFORMATION

We may share your personal information in the instances described below. For further information on your choices regarding your information, see the “Control Over Your Information” section below.

Remember, our Service allows you to connect and interact with others. **Your profile information, including your name, photo, and other personal information, will be available publicly to other members of the Service by default when you create a profile, interact with others on the Service in public groups, and post content to public spaces.**

We may share your personal information with:

- The public and other members of the Service. Your profile information and content you post to public areas of the Service, including public groups, will be viewable by others on the Service and the public. Please do not provide personal information you would not want to be public. You may be able to control the visibility of some of your information and actions in your Settings (see “Control Over Your Information” below);
- Other users of the Service. We share your information with third parties with whom you communicate with on the Service. You control who you want to communicate with and what information you share;
- Third parties at your request. For example, you may have the option to share your activities on Passant with your friends through email, text or on various social media sites;
- Other companies and brands owned or controlled by Passant and other companies owned by or under common ownership as Passant, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Policy;
- Third-party vendors and other service providers that perform services on our behalf, as needed to carry out their work for us, which may include providing tax and accounting services, web hosting, or providing analytic services;
- The public when you provide feedback or user content on our Service. For example, if you post user content on our blog or comment on our social media sites, your information, such as your first name, last initial, state of residence, and your comments, may be displayed on our Service or on our social media pages;
- Other parties in connection with a company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party, or in the event of a bankruptcy or related or similar proceedings; and
- Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use [\[link\]](#) or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of Company, our visitors, or others.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

4. CONTROL OVER YOUR INFORMATION

Profile and Data Sharing Settings. You may update your profile information, such as your user name and profile photo, and may change some of your data sharing preferences on your Settings page.

Access to your Device Information. You may control the app's access to your device information through your "Settings" app on your device. For instance, you can withdraw permission for the app to access your address book and location.

How to control your communications preferences: You can stop receiving promotional email communications from us by clicking on the "unsubscribe link" provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices).

Modifying or deleting your information: If you have any questions about reviewing, modifying, or deleting your information, or if you want to remove your name or comments from our Service or publicly displayed content, you can contact us directly at help@onpassant.com. We may not be able to modify or delete your information in all circumstances.

5. THIRD PARTY TRACKING AND ONLINE ADVERTISING

We may share, or we may permit third party online advertising networks, social media companies and other third party services, to collect, information about your use of our website over time so that they may play or display ads that may be relevant to your interests on our Service as well as on other websites or apps, or on other devices you may use. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, including hashed data, click stream information, browser type, time and date you visited the site, and other information. This information is used to display targeted ads on or through our Service or on other websites or apps, including on Facebook. We or the online advertising networks use this information to make the advertisements you see online more relevant to your interests.

As noted above, depending on your browser or mobile device, you may be able set your browser to delete or notify you of cookies and other tracking technology by actively managing the settings on your browser or mobile device. You may also be able to limit interest-based advertising through the settings on your mobile device by selecting "limit ad tracking" (iOS) or "opt-out of interest based ads" (Android). To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org/choices>, and/or the DAA's resources at www.aboutads.info/choices, and you may also adjust your ad preferences through your Facebook settings. Some of these opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers or delete the opt-out cookie, you may need to perform the opt-out task again. You may also be able to opt-out of some - but not all - interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at help@onpassant.com.

6. HOW WE STORE AND PROTECT YOUR INFORMATION

Data storage and transfer: Your information collected through our Service may be stored and processed in the United States or any other country in which Passant or its affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which Passant or its parent, subsidiaries, affiliates, or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

Keeping your information safe: We care about the security of your information and uses commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information collected through our Service. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our

control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

6. CHILDREN'S PRIVACY

Passant does not knowingly collect or solicit any information from anyone under the age of 13 on this Service. In the event that we learn that we have inadvertently collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us at help@onpassant.com.

7. LINKS TO OTHER WEB SITES AND SERVICES

The Service may contain links to and from third party websites of our business partners, advertisers, and social media sites and our users may post links to third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third party sites.

8. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Service, please contact us at help@onpassant.com.

9. CHANGES TO OUR PRIVACY POLICY

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know and update the 'last modified' date at the bottom of this page. If you object to any changes, you may close your account. Continuing to use our Service after we publish changes to this Privacy Policy means that you are consenting to the changes.

This privacy policy was last modified on 6/23/17.