Villagechat Privacy Policy

This Privacy Policy was last modified on June 14th, 2024.

Villagechat protects and connects your loved ones to make your life easier and less stressful. We take your privacy as seriously as you do, and we are committed to protecting it. This Privacy Policy explains our practices regarding the collection, use, disclosure, transfer, storage, and protection of personal information that is collected through our products and services, as well as your choices regarding the same.

As you review our policy, keep in mind that it applies to Villagechat, LLC's ("VC", "we", "our", or "us") websites, mobile apps, help center and other associated services we provide ("Services").

Before accessing or using our Services, please ensure that you have read this Policy and understand how we collect, store, use, and disclose your personal information as described herein.

I. INFORMATION WE COLLECT

The information VC collects depends on what VC Services you use and how you use them.

Note that failure to provide necessary information when requested may result in you not being able to fully utilize our Services.

A. Information You Give Us Directly

When you create or modify a VC account, update your preferences, purchase and/or activate Services, contact us, participate in an online survey, or otherwise interact with VC's Services, we may collect a variety of information, including:

 Account Information. Your username, email address, real name, nicknames, date of birth, telephone number, password, and shipping and billing addresses. You may also choose to provide a photo to associate with your VC account.

- Identity Verification. In certain circumstances, for instance, depending on the features of our Services you use or based on your age and country of residence, we may collect additional information to verify that a parent or guardian has consented to use of the Services by a child. This information may include information from or an image of government-issued ID, an image (for example, a selfie) which may be used with facial recognition technology. (Note: the digital age of consent may vary by jurisdiction and VC may adjust our parental consent process accordingly.)
- **Optional Account Information.** We may collect information when you customize features within our Products.
- Other Information You Provide to Us. Information you provide in response to surveys about our Products or Services, any information about your friends that you provide us through our referral services, information you provide when seeking help from us, such as your name, email address, telephone number, mailing address and records (including call recordings) and technical information related to the issues you experience.

B. Information We Collect When You Use or Interact with our Products and Services

We may collect other information when you use our Products and Services, such as:

- **Device Information.** Information about your device, hardware and software information, such as your mobile device identifiers, IP address, or browser information (including browser type and language preference).
- Location and Movement Information. We collect your location and motion information through your IP address, WiFi, Bluetooth, and GPS coordinates (e.g., latitude/longitude) available through your mobile device, motion information such as altitude, heading and speed.
- Messages and Member Content. We collect information when you message other members of our Services through use of our Services, when you provide VC with feedback, when you make a blog post, comment, or when you tag VC in a social media post, any photos or videos you send via the in-app messaging.

C. Information Provided to Us by Third Parties

We may receive information about you from other sources, including through third-party services that you connect to your VC account, or third-party services and organizations to supplement information provided by you. For example:

- When you choose to connect or interact with our Services through a third-party social networking service ("Social Network"), such as when you Like us on Facebook or post a comment to our Facebook page, we may collect information that you have already made public on your Social Network account.
- We may use social plugins, widgets and other features (each, a "Social Feature") that are made available by and/or access third-party Social Networks. These Social Features allow these Social Networks to place cookies on your browser and to collect certain information, which may be associated with your personal Social Network account such as your name, your Social Network user identification number, your Social Network username, location, gender, birth date, email, profile picture, and your contacts on the Social Network.

II. HOW WE COLLECT INFORMATION

When you visit our our apps, read our emails or otherwise engage with us, we may automatically collect certain information about your device through a variety of technologies, including cookies, web beacons, log files, embedded scripts, location-identifying technologies, or other tracking/recording tools (collectively, "**Tracking Technologies**"), and we may combine this information with other personal information we collect about you. We use these Tracking Technologies to collect usage and device information, such as:

• Information about the computer, tablet, smartphone or other device you use, for example, your device's IP address, browser type, Internet service provider, platform type, device type/model/manufacturer, operating system, phone number, mobile carrier, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account (including, for example, a UDID, IDFA, Google Ad ID, Windows Advertising ID or other persistent device identifier or Ad ID), battery life, whether the device is connected to WiFi, and other such information. With your permission, we may also access your photo or camera roll.

III. HOW WE USE YOUR INFORMATION

We may use your information to provide, maintain, and improve our Services to develop new products and features, to determine which new products or services may be of interest to you and to promote our Services, and we may disclose your information to our Service Providers and Business Partners for these purposes.

We may also de-identify, anonymize, or aggregate the information we collect, or collect it in a way that does not directly identify you. We may use and share such information for our business purposes and as permitted by applicable law.

The specific purposes for our acquisition, retention, use, and processing of your information are described in this Section III (How We Use Your Information).

A. Administrative Purposes

We may use information about you for our administrative purposes, including to:

- Provide the Service to you;
- Measure interest in VC's Services;
- Develop new products and Services;
- Ensure the integrity, security and perform internal quality control and optimization of our Service;
- · Verify individual identity;
- Communicate about individual accounts and activities utilizing VC's Services, and systems;
- Make changes to any VC policies;
- Send messages to the email address you provide to us to verify your Account;
- For informational, transactional, marketing and operational purposes, such as Account management, customer service, or system maintenance;
- To process payment for products or services purchased;
- To process applications and transactions;
- To prevent potentially prohibited or illegal activities; and
- To enforce our Terms of Use and this Privacy Policy.

B. Marketing VC Products and Services

VC may use information, and Individuals who provide us with personal information may receive periodic emails, newsletters, mailings, or phone calls from us, as allowed by applicable law, for marketing purposes such as to:

- Provide you with information related to VC's or our business partners' products and services that may be of interest to you;
- Notify you of upcoming special offers/events we believe may be of interest;
- · Conduct online behavioral advertising;
- Tailor content, advertisements, and offers that may be of interest to you;
- Introduce new content, features, Products or Services.; and
- For other purposes disclosed at the time that you provide us your information; or otherwise with your consent.

C. Research and Development

We may use information to create non-directly identifiable information that we may use alone or in the aggregate with information obtained from other sources as set forth herein, in order to:

- Conduct individual or market research:
- Conduct research and drive marketing analytics;
- Help us to optimally deliver our existing Services;
- To develop new Services; and
- For research and internal analysis.

For instance, from time to time, VC may perform research (online and offline) via surveys. We may engage third-party service providers to conduct such surveys on our behalf (all survey responses are voluntary). The survey responses may be utilized to:

- Determine the effectiveness of our Services,
- Perform various types of communications, advertising campaigns, and/or promotional activities; and
- Learn more about our members and potential members and their individual and collective needs

If an individual participates in a survey, the information given may be used along with that of other study participants. We may share anonymous individual and aggregate data for research and analytics purposes.

D. Information Collected Automatically Through the use of Tracking Technology

We use information collected through the use of Tracking Technologies (e.g., cookies and web beacons) for our business purposes, or similar, including to:

- Remember information so that you will not have to re-enter it during your visit or the next time you visit our website or use our Services;
- Authenticate your access;
- Keep track of your in-app specified preferences or choices;
- Display a personalized browsing history
- Provide custom, personalized content and information, including targeted content and advertising;
- Record your device's location and movements;
- Identify and contact you across multiple devices;
- Provide and monitor the effectiveness of our Services and our marketing campaigns;
- Monitor aggregate metrics such as total number of visitors, members, traffic, and demographic patterns;
- Provide specific technical support (diagnose or fix technology problems reported by our members or engineers that are associated with certain IP addresses or User IDs;
- Detect or prevent fraud or other harmful activities;
- Automatically update our mobile application on your system and related devices; and
- Otherwise plan for and enhance our Services.

IV. INFORMATION WE DISCLOSE TO THIRD PARTIES

We may disclose your information to select third parties as well as our subsidiaries as set forth herein.

We may also disclose this information within VC, with our subsidiaries, and with third parties for our or their purposes in an anonymized or aggregated form.

A. Disclosing to Other Members

You may choose to disclose your personal information to other members, including your:

- Full name;
- Email address;
- precise location;
- driving event data; and
- information about your use of our Service with other members (e.g., whether you have logged in on a new device)

In addition, other members may disclose your personal information in certain circumstances.

B. Service Providers, Business Partners, and Advisors

We may disclose your personal information to our vendors and consultants who help us provide our Services or who perform services on our behalf, such as accounting, managerial, technical, email or chat services, marketing or analytic services, fraud prevention, bot detection, web hosting, and to other third-party partners or Service Providers to provide services or features to our members on our behalf or on behalf of our permitted business partners.

We may disclose personal information, including contact information and location and movement data, mobile device information (such as information generated by the gyroscope and accelerometer in your device), application analytics (including IP address and device identifiers), technical and analytical data, and driving event data with third-party partners that provide certain features and services you elect to use through or in connection with Service, to the extent that they are available in your country or region of residence. Some examples are as follows:

We will never disclose your telephone number (in a non-obfuscated format) with any of our third-party business partners, vendors, or consultants for their independent SMS marketing purposes without your explicit, affirmative opt-in consent.

C. Purchasers and Other Third Parties in Connection with a Business Transaction

We may at any time buy or sell/divest the company, or any portion or combination of its products, services, assets and/or businesses. Personal information such as member names and email addresses, and other member information related to our Services will likely be one of the items transferred in these types of transactions. We may disclose, transfer or assign such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, or similar transactions or proceedings.

D. Law Enforcement, Regulators, and Other Parties for Legal Reasons

We may disclose personal information to third parties (including but not limited to, law enforcement, other government entities, or civil litigants) when required to do so by law or subpoena, or if we determine (in our sole discretion) that disclosure is necessary to: (a) conform to the law, comply with legal process, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce our <u>Terms of Service</u>, this Privacy Policy, to take precautions against liability, to investigate and defend ourselves against any claims or allegations, or to protect the security or integrity of our site; and/or (c) to exercise or protect the rights, property, or personal safety of VC, our employees, members or others.

E. De-Identified Information

Some third parties provide important services to us as our service providers and have rights to commercialize solely aggregated data for certain purposes, as set forth in our <u>Service Provider and Third-Party Processing Chart</u>. We may share with third parties, including advertisers, Business Partners, and Service Providers, anonymized, aggregated and/or anonymous data we collect about you and other members, such as de-identified demographic information, de-identified location information, and information about the computer or device from which you access our Services, or the results of hashing your email address.

V. YOUR CHOICES ABOUT YOUR INFORMATION

We believe in transparency and providing you with the opportunity to make important decisions about how your information is used, processed, stored and shared as outlined in this Section V (Your Choices about Your Information).

A. Modifying, Correcting, Reviewing, and Deleting Your Information

You may modify your account information, update or amend your personal information (e.g. name, email address, or phone number), or change your password by logging in to your App, clicking on "Settings" and then "Account."

You may review the information we collect or disclose about you, the categories of sources of such information, the business or commercial purpose for collecting your information, and the categories of third parties with whom we disclose personal information, or request that your information be deleted by submitting a request to privacy@igbohome.com. Please note that the information provided via the in-App links described in this section does not include technical information or support records. If you would like to request information related to your support records, please contact us directly at privacy@igbohome.com).

You may request the closure and deletion of your account by contacting us at privacy@igbohome.com with your deletion request. Please include your full name, email address associated with your Account, the service you are using, and a detailed description of your deletion request.

B. Communications from VC

We may periodically send you promotional newsletters and emails. You have the ability to opt-out of these by following the unsubscribe instructions provided in the emails you receive. Certain communications, like billing information and Service updates are necessary for you to receive, you will not be able to opt-out of those communications.

C. Location and Movement Data Collection and Sharing in the VC App

As described in Section II, we collect precise location data and movement data from your device to provide the VC Services, and may share your personal information, including location and movement data, with other VC members that you have authorized, and with third parties for research, analytics, and attribution. You have

many options to control this data collection and sharing activity through the App Settings.

If you no longer want to continue using the Services, uninstalling the VC app (as applicable) and logging out from our Service will also stop us from collecting your location

VI. OUR POLICY TOWARDS CHILDREN

VC takes special precautions to protect the privacy of our younger members. VC does not knowingly collect personal information from children who do not meet applicable minimum age requirements without verifiable consent of a parent or guardian, and our Services are only intended to be used by children with significant parental or guardian involvement and approval.

If VC learns that we have inadvertently collected personal information of a child without parental consent as required by law, we will take appropriate steps to delete this information. If you are a parent or guardian and discover that your child has a registered account with our Services or is using our Products without your consent, please alert us immediately by emailing privacy@igbohome.com.

By enabling your child to create a member account and/or permitting your child to use the Products or Services, you expressly agree to the practices described in this Privacy Policy and you consent to the collection, use, and disclosure of your child's personal information as described herein.

A. Setting up a Child Account

If a parent wishes to add a member who is a child to our Services, we create and send a unique link code to the parent that they use to connect the parent/child accounts. The child will then be able to participate in most aspects of the VC Services. By providing the Services to a child, you represent and warrant to VC that you consent to such child's use of our Services and further consent as a parent to enable and permit VC's collection and use of the information from the Products and Services used by the child as stated in this Privacy Policy and the <u>Terms of Service</u>.

B. Personal Information we Collect about Children

We take special precautions to collect only as much information as is reasonably necessary for the child to use our Services.

C. Information sharing about Children

VC may disclose a child's personal information to our third-party vendors, Service Providers, and business partners as described in this Privacy Policy. We do not share or sell personal information of members we know to be children. Profile and location information for children using the Service may be shared with other members that you authorize. You are responsible for monitoring your child's account and location-sharing activity through our Products and Services and for blocking or permitting location-sharing features.

D. Contact Us Regarding your Child's Account or Information

The parent or legal guardian has a right to request to review or have deleted the child's personal information and may withdraw consent for our Products and Services to collect any further personal information from the child. Please contact us at privacy@igbohome.com to request to review and/or delete any personal information we may have collected from the child, or to withdraw permission for VC to collect any additional information from the child. We will require the parent or guardian to provide us with sufficient identification before providing access to, or acting upon, such personal information.

VII. HOW WE PROTECT YOUR INFORMATION

VC cares about the security of your information. The actions we take to protect your personal information are described below.

A. Security

We have implemented appropriate standards to reduce the risk of unauthorized or unlawful access of your personal information. No security system is impenetrable and we cannot absolutely guarantee the security of our systems and your information.

We will never send you unsolicited messages or contact you by phone to request sensitive information, such as your account ID, password, payment, or national ID numbers. Please note that e-mails and other communications you send to us are not encrypted, and we strongly advise you not to share any sensitive information through these means.

If 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 any impacted individuals and take steps in accordance with any applicable laws and regulations.

B. Accuracy and Confidentiality of Your Email Address and Password

You are responsible for the secrecy of your password and ensuring the email address associated with your account(s) is accurate. We use your email address to contact you about service updates, changes to our policies, and account activities such as requests for your information. We recommend using a strong password unique to this service. If you believe your account has been compromised, change your password immediately via the applicable app or website.

VC is not responsible for information or data transmitted to a third party as a result of a member providing an incorrect phone number or email address.

C. Onward Transfer

We may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

D. Data Retention

VC retains the information we receive as described in this Privacy Policy for as long as you use our Products or Services or as otherwise necessary to fulfill the purpose(s) for which it was collected, to resolve disputes, establish legal defenses, conduct audits, pursue legitimate business interests, enforce our agreements, and to comply with applicable laws. The purposes for which we process information may dictate different retention periods for the same types of information.

VIII. ADDITIONAL STATE, COUNTRY, AND REGION-SPECIFIC PRIVACY TERMS

A. California Consumer Privacy Act (CCPA) and California Consumer Rights Act (CPRA)

California residents can make certain requests about their personal information under the CCPA. Specifically, if you are a California resident, you have the right to request any or all of the following information relating to your personal information we have collected and used in the last 12 months, upon verification of your identity:

• provide you with the specific pieces of personal information we have collected about you and information about: the categories of personal information we have collected about you; the categories of sources of the personal information; the categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed; the categories of personal information we have sold or shared and the categories of third parties to whom the information was sold or shared; and the business or commercial purpose for collecting or selling/sharing the personal information.

You also have the following rights with regards to your personal information:

- the right to opt-out of personal information sales and shares for cross-context behavioral advertising;
- the right to limit our use of your sensitive personal information;
- the right to correct inaccurate personal information about you;
- the right to delete certain information we have about you;
- the right for us to provide you with information about the financial incentives that we offer to you, if any; and
- the right to not receive discriminatory treatment for exercising these rights.

Certain information may be exempt from such requests under applicable law. For example, we may retain certain information for legal compliance and to secure our Services. We may need certain information in order to provide our Services to you; if you ask us to delete it, you will no longer be able to use our Services.

Categories of Personal Information Collected

Depending on your use of our Services, the following categories of personal information may have been collected in the preceding 12 months (as these processing activities are defined under applicable privacy laws, such as the California Consumer Privacy Act "CCPA" and the California Privacy Rights Act "CPRA"):

• **Identifiers**; such as a real name, user name, account name, account information, ID verification information, telephone number, email address, online identifiers, device identifiers, IP address, mobile device identifiers, shipping address;

- **Purchase information;** such as payment card number, payment account details, billing address, and other payment information;
- Characteristics of Protected Classifications under state or federal law; such as age, gender, ethnicity, and race;
- Commercial Information; such as products or services interaction, motion, and fitness information, and purchase history;
- Internet or Electronic Network Activity information; such as browsing history, search history, and information regarding interactions with our Products and Services, websites, mobile apps, and/or advertisements;
- **Geolocation Information**; such as location data derived from IP address or device settings;
- **Inferences**; such as consumer preferences drawn from the above.

California Consumer Information Sold or Shared in the Last 12-Months

In the previous 12 months, if you were a VC member we have sold or shared the following categories of personal information to third-party partners and advertising partners for targeted marketing, attribution, analytics, and research purposes (subject to your settings and opt-outs): Identifiers, Internet/Network information, Geolocation, Inferences, and Other personal information, including driving event and movement data. These third-party businesses may use such information for their own purposes in accordance with their own privacy statements, which may include reselling this information to additional third parties, including other advertising networks.

Other Ways to Exercise Your California Rights

Alternatively, you may submit a request to exercise your California privacy rights via email by contacting us at privacy@igbohome.com and including your account name and mobile telephone number as well as the consumer right you would like to exercise. To protect your privacy and security, we take reasonable steps such as verifying your email address and specific information to verify your identity and request.

B. Legal Basis for Processing

Our legal basis for processing your personal information varies depending on the type of information we collect and the context in which we collect it as well as our records of your country of residence. Depending on where you reside, we may rely on different legal bases to process your information.

If you are a resident of the European Economic Area or of a jurisdiction where similar legal requirements may apply such as Brazil, Switzerland, and the United Kingdom, we rely on a number of legal bases to process information about you. We will process information about you where we have your consent, where we have a legitimate interest to do so, where the processing is necessary for the performance of a contract with you, and/or where we have a legal obligation to process your information. For example, we typically rely on:

- necessity to meet an actual contractual obligation when you create a VC account to enable us to provide you with our Services.
- consent when placing cookies on your device on the web (through our cookie consent manager), to send you email marketing, or to deliver third-party targeted advertising to you related to our Products and Services;
- our legitimate interests to process your information when providing you with customer service support, to serve targeted marketing of our Products and Services, for fraud prevention and security purposes;
- to fulfill our contractual obligations; and
- necessary for compliance with a legal obligation to which we are subject.

C. California's "Shine the Light" Law

California's "Shine the Light" law (Civil Code Section § 1798.83) provides certain rights to California residents that have an established business relationship with us with regard to the disclosure of certain types of personal information to third parties for their direct marketing purposes. To opt-out of having your personal information disclosed to third parties for their direct marketing purposes, send an email to at privacy@igbohome.com.

D. Your Nevada Privacy Rights

Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt-out of future sales of certain covered information that a website operator has collected or will collect about the resident. To exercise your Nevada opt-out rights: you may send an email to privacy@igbohome.com with the subject line "Nevada Privacy Rights" and include your account name and mobile telephone number. We may need to contact you to request additional information to verify your request.

E. International Transfer

You agree that all information collected via or by VC may be transferred, processed, and stored anywhere in the world, including but not limited to, the United States, the United Kingdom, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to VC, you explicitly consent to the storage of your information in these locations, this may mean that your personal information will be stored in a jurisdiction that offers a level of protection that may, in certain instances, be less protective of your personal information than the jurisdiction you are typically resident in. We will implement appropriate safeguards to ensure that your personal information is treated securely and in accordance with this privacy policy, including: (i) ensuring that we use your personal information in accordance with standard data protection clauses adopted by the European Commission for transfers of personal data to recipients outside the EEA and UK; and (ii) ensuring that any recipients of your personal information commit to the same standards. If you wish to enquire further about the safeguards used, please contact us using the details set out at the end of this privacy notice.

IX. LINKS TO OTHER WEBSITES AND SERVICES

Our Services may contain links to websites and services that are owned or operated by third parties. Any information that you provide on or to a third-party service, or that is collected by a third-party service, is provided directly to the owner or operator of the third-party service and is subject to the owner's or operator's privacy policy. Please remember that when you use a link to go from the VC Services to another website or app, or engage with a third-party service, our Privacy Policy does not apply to those third-party websites or services. Your browsing and interaction, on any third-party website or service, including those that have a link on our website, are subject to that third party's own rules and policies, and VC is not responsible for the practices employed by those apps, websites, or services, nor the information or content contained therein.

X. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time, so please review it frequently. If we are required by applicable data protection laws to give you enhanced notice or seek out consent to any such changes, we will do so. Otherwise, changes to this policy will be effective when posted.

If you object to any of the changes to this Privacy Policy, you must cease using our Services, and may request us to erase your personal information. Any information that is collected through your use of our Services is covered by the Privacy Policy in effect at the time such information is collected.

XI. CONTACT US IF YOU HAVE QUESTIONS OR CONCERNS

If you have any questions about our privacy practices, this Privacy Policy, our Products, or Services, please contact us at privacy@igbohome.com or by postal mail:

Villagechat, Inc.

ATTN: Privacy

5206 Granny White Pike

Nashville, Tennessee 37220

United States

A. Authorized Agents

You may authorize another person (your "agent") to contact us on your behalf. Authorized agents must submit the request via email to privacy@igbohome.com and include a signed letter from the VC member confirming the agent has permission to submit the request on the member's behalf. In certain circumstances, we may need to request additional information to verify the identity of the member about whom the request is being made and/or to verify that the member has provided the authorized agent permission to submit the request, and it may take additional time to fulfill agent-submitted requests. Please note that for privacy and security reasons, we will direct future communications to the VC member on whose behalf the request was made. We may deny a request in the event we are not able to verify the authorized agent's authority to act on your behalf.