

PRIVACY POLICY

Last updated: 06-07-2019

CelebConnect Inc. respects the privacy of our users. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our TownPals and TownChat apps. Please read this Privacy Policy carefully. If you do not agree with the terms of this Privacy Policy, please do not access these apps.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Apps after the date such revised Privacy Policy is posted.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Apps or make payments, including any in-game virtual items, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the Apps depends on the content and materials you use, and includes:

Personal Data

Demographic and other personally identifiable information (such as your name and

email address) that you voluntarily give to us when choosing to participate in various activities related to the Apps, such as chat, posting messages in comment sections or in our groups, liking posts, sending feedback, and responding to feedback surveys. If you choose to share data about yourself via your profile, online chat, or other interactive areas of the Apps, please be advised that all data you disclose in these areas will be accessible to anyone who is connected with you through these Apps but will not be publicly available unless you desire so to share it publicly.

Derivative Data

Information our servers automatically collect when you access the Apps, such as your native actions that are integral to the Apps, including liking, or replying to a post, as well as other interactions with the Apps and other users via server log files.

Financial Data

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the Apps. [We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processor, [\[Google Checkout,\]](#) and [\[Stripe,\]](#) and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

Geo-Location Information

We may request access or permission to and track limited location-based information from your mobile device, either continuously or while you are using the Apps, to provide any location-based services.

Mobile Device Access

We may request access or permission to certain features from your mobile device, including your mobile device's [bluetooth, calendar, camera, contacts, microphone, reminders, sensors, SMS messages, social media accounts, storage,] and other

features. If you wish to change our access or permissions, you may do so in your device's settings.

Mobile Device Data

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.

Push Notifications

We may request to send you push notifications regarding your account or the Apps. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

Data From Contests, Giveaways, and Surveys

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Apps to:

1. Administer certain location specific services.
2. Assist law enforcement and respond to subpoena.
3. Compile anonymous statistical data and analysis for use internally or with third parties.
4. Create and manage your account.
5. Email you regarding your account.
6. Enable user-to-user communications.
7. Fulfill and manage purchases, orders, payments, and other transactions related

to the Apps.

8. Generate a personal profile about you to make future visits to the Apps more personalized.
9. Increase the efficiency and operation of the Apps.
10. Monitor and analyze usage and trends to improve your experience with the Apps.
11. Notify you of updates to the Apps.
12. Offer new products, services, mobile apps, and/or recommendations to you.
13. Perform other business activities as needed.
14. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
15. Process payments and refunds.
16. Request feedback and contact you about your use of the Apps.
17. Resolve disputes and troubleshoot problems.
18. Respond to product and customer service requests.
19. Send you a newsletter.
20. Solicit support for the Apps.
21. [Other]

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

Marketing Communications

We will never share your information with third parties for marketing purposes nor will we sell your personal data to marketers, advertisers or any other third parties.

Interactions with Other Users

If you interact with other users of the Apps, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.

Online Postings

When you post comments, contributions or other content to the Apps, your posts may be viewed by all users but will never be publicly distributed outside the Apps.

Third-Party Advertisers

We will not use third-party advertising companies to serve ads on any of our Apps.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

Business Partners

We will never share your information with our business partners to offer you products, services or promotions.

Other Third Parties

We may use data collected for the purpose of conducting general business analysis but personal information of users will not be collected in this case. We may share your information with such third parties for lawful purposes, as permitted by law.

Sale or Merger

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity with your prior consent. We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

TRACKING TECHNOLOGIES

Cookies and Web Beacons

[We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Apps to help customize the Apps and improve your experience. When you access the Apps, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Apps. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.]

[We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Apps to help customize the Apps and improve your experience. For more information on how we use cookies, please refer to our Cookie Policy posted on the Apps, which is incorporated into this Privacy Policy. By using the Apps, you agree to be bound by our Cookie Policy.]

Website Analytics

We have partnered with selected third-party vendors [[Google Analytics](#),] and [[Segment](#),] to allow tracking technologies on the Apps through the use of first party cookies and

third-party cookies, to, among other things, analyze and track users' use of the Apps, determine the popularity of certain content, and better understand online activity. By accessing the Apps, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor or the [Network Advertising Initiative Opt-Out Tool](#) or [Digital Advertising Alliance Opt-Out Tool](#).

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

THIRD-PARTY WEBSITES

The Apps may contain links to third-party websites and apps of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Apps, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or apps.

SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be

guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile apps include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

OPTIONS REGARDING YOUR INFORMATION

Account Information

You may at any time review or change the information in your account or terminate your account by:

- Visiting your account settings and updating your TownChat account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations,

enforce our Terms of Use and/or comply with legal requirements.]

Emails and Communications

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Apps
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Apps, you have the right to request removal of unwanted data that you publicly post on the Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

CONTACT US

If you have questions or comments about this Privacy Policy, please contact us at:

CelebConnect Inc.

8 the Green, Suite 6875

Dover, Delaware 19901

Ph # +1 (302) 603-7929

Email: info@celebconnectapp.com