



**real** people, **honest** dating!

# PRIVACY POLICY

# 1. INTRODUCTION & DEFINITIONS

This document is the **Privacy Policy** of PriveTalk. The Privacy Policy document, together with the **Terms & Conditions** document and the **Dating Safety Guide** document constitute collectively the "**Agreement**" which is the legal contract between you, the user of PriveTalk, and us, SocioBright Ltd, the owner of PriveTalk. All three documents are available on the PriveTalk's application registration page, on the PriveTalk's application's "About" section and also at the footer of the official website, <http://app.privetalk.com>.

In this document and in the Agreement, "**you**" refers to you as the user of the PriveTalk application(app) or of any of PriveTalk's related Service(s) including its website. As the user of PriveTalk, you are entitled to use our provided Service only by reading, understanding, complying, accepting and following the terms and provisions found in the Agreement.

"**Service**" refers to the access or use of any of SocioBright's products and services, including your access and use of the PriveTalk application or website. The term "**user**" refers to the user of the Service, regardless of when or for how long the Service was used.

The Privacy Policy explains how information about you or associated with you ("**personal information**") is collected, used and disclosed by SOCIOBRIGHT LTD ("**company, "we" or "us"**") when you use any part of the Service(s).

# 2. PRIVACY POLICY EXPLANATION & TERMS

## 2.1. General Description

In SocioBright Ltd, we respect deeply the privacy of our users, as reflected in all of our products, including PriveTalk. We do our best to make our Privacy Policy easy to understand and transparent. This Privacy Policy describes the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. We encourage you to read this Privacy Policy carefully before and when using our application or services or transacting business with us.

## 2.2. Acceptance of the Privacy Policy

By either registering, using or subscribing to the Services, you confirm that you have read and consent to our entire Privacy Policy, and the entire Agreement as defined in section 1 of this document.

If you have any questions about our privacy practices, please refer to the end of this Privacy Policy at section 2.10 for information on how to contact us.

## 2.3. Information we collect about you

When you register, use or subscribe to any of our Services, we may collect a variety of information including:

- **Sensitive Account information** such as your full name, date of birth, email address, PriveTalk password, phone number, billing/ living address, credit card data and related billing information, that allow PriveTalk to personalize your contact/customer experience, monitor your account security and securely process your payments. **That information is strictly confidential and you should not share it with any PriveTalk users.**
- **Public Account Information** including first name, age, gender, gender of sexual preference and manually set location (or GPS location if you wish), that will be shared publicly on your profile to ensure a high standard of online dating experience.
- **Other Personal Information** such as appearance characteristics, smoking/drinking habits, known languages, education level, occupation, religion, zodiac sign, GPS location, interests etc. Those information are voluntarily completed by you, and will be shared with all users visiting your profile. The purpose of those information are to allow other users to know you better and identify common information with you, or search for you based on some specific characteristics on our customized search tool.
- **Uploaded Content Information** such as the personal pictures and other personal data that you upload on your profile. At least one uploaded personal picture has to be verified by us in order for you to unlock the chatting mode with other users for free. In the verification process, three consecutive verification purpose pictures will be taken live in order for us to confirm that the user has uploaded his/her real pictures. The personal pictures uploaded by the user will be shared publicly among PriveTalk users while the

verification purpose pictures will be kept hidden from PriveTalk users and used strictly for moderation purposes.

- **Your Communication with Other Users.** Currently when our users exchange information by messaging each other they see an expiration timer that starts counting once the user who received the new information opens the message. The expiration timer for all messages is set by default at 7 days, meaning that in approximately 7 days after both users view the new information, the specific information will expire from their screens. However, users who have an active subscription can manually set/change the expiration time for the messages that they send to be less than the 7 days. Even though the exchanged information may thus expire in 7 days or less from both the sender's and the receiver's phones, our company may keep records of all the exchanged information for a longer period of time for safety and moderating reasons. For these reasons, the company by default is keeping the records all personal communication information for one month, and after that period of time this information is automatically set to be deleted from our records permanently. However, the company reserves the right to change the time that it keeps such information with or without any notice
- **Your Communication with Us.** We collect information that you send to us (such as emails or via the contact us form found in the PriveTalk app), comments that you post on the pages we have on a third-party service, such as our YouTube, Twitter and Facebook pages and messages that you send us directly through those services.
- **Information Automatically Collected.** When you access the Services we may automatically record information from your device and its software about your participation and actions on the Services, by using in-house or third party technologies such as cookies and web beacons. Also if you choose to integrate a third-party social media account such as Facebook, Google+ or Vkontakte with our services, you permit PriveTalk to access certain information about you that is made available from the connected Social Networking Site. The information obtained by PriveTalk varies by Social Networking Site and may be affected by the privacy settings you establish at that Social Networking Site, but can include information such as your name, profile picture, gender, age or birthday, language, location, interests, contacts' list, friends' lists and other information.
- **Information Provided by Others.** We may be provided with information relating to you or your conduct on the Services by other users of the Services. We also collect information that third-party organizations may provide to us, such as contact details, demographic information, internet navigation details, credit reference or fraud prevention information. Financial institutions or payment processors may also provide us updated payment information or payment methods related to your paid account or paid subscription.

We may collect all of the information mentioned in this document through a website or a mobile application or other means. By using the Service, you agree that you are authorizing us to gather, parse and retain data related to the provision of the Service.

## 2.4. How we use the information we collect

In General. We may use information that we collect about you:

- manage your account and provide you with a high quality of customer support;
- protect our users' safety and maintain a respectful social community that uses our products;
- deliver and improve our products and services, and manage our business;
- perform research and analysis about your use of, or interest in our products, services, or content;
- communicate with you by email, mail, telephone and/or mobile devices about products or services that may be of interest to you either from us or from third parties;
- develop, display, and track content and advertising tailored to your interests on our Service and other sites;
- enforce or exercise any rights in our Terms and Conditions and in our Agreement and
- perform functions or services as otherwise described to you at the time of collection.

In all circumstances, we may perform these functions directly or use a third party vendor to perform these functions on our behalf. Also, if you access our Service from a third party social platform, such as Facebook, we may share non-personal information with that platform to the extent permitted by your agreement with it and its privacy settings.

## 2.5. With whom we share your information

- **Information Shared with Other Users.** When you register or use our services, your PriveTalk public profile data will be viewable by other users of the Service within various areas in the Service.
- **Service providers.** We may share information, with third parties that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, ad tracking and analytics, member screenings, supporting our Service functionality and technical assistance, or other features offered through

our Service. These service providers may have access to personal information needed to perform their explicitly assigned functions but are not permitted to share or use such information for any other purposes.

- **Other Situations.** Also in extraordinary cases we may disclose your information, including personal information:
  - a) In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.
  - b) When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our Terms or other agreements or policies.

## 2.6. How We Contact You

We may contact you personally by email, mail, in-app notification, in-app private messages, push notification or other communication tools.

To change specific communication settings or privacy settings, please use the “settings” menu found on our main menu screen of our PriveTalk application.

Customer Service Requests may be answered either by your account email, or directly via our secure direct messaging in-app platform facilitated by our PriveTalk application. To submit a Customer Service ticket please use the “contact us” button found in the “about” section at the main app menu screen.

## 2.7. How we protect your personal information

We take security measures to help safeguard your personal information from unauthorized access and disclosure, with encrypted technologies, expiration timers, anti-hacking third-party and in house tools, and strong moderation, among other safety features that are offered in our apps. However, no system can be completely secure. Therefore, although our high efforts to secure your information, we do not promise, and you should not expect, that your personal information, chats, or other information will always remain secure. Users should also take care with how they handle and disclose their personal and private information. Please refer to the Federal Trade Commission’s website at <http://www.ftc.gov/bcp/menus/consumer/data.shtm> for information about how to protect yourself against identity theft, and also be sure to read our **Dating Safety Guide document** for advices regarding your personal safety when using online dating services.

## 2.8. Minor’s privacy

Although our Service is a general audience Service, we restrict the use of our service to individuals age 18 and above. We do not knowingly collect, maintain, or use personal information from people under the age of 18.

## 2.9. Changes to Privacy Policy

We reserve the right to modify this Privacy Policy at any time, in our sole discretion, with or without notice. The modified Privacy Policy would be made publicly available on either the PriveTalk application, or/and PriveTalk website or/and through other communication media such as the Application Stores that will host our app, etc.

When we post changes to this Privacy Policy, we will revise the “Last Revision Date” at section 2.11 found at the bottom of this document. You should review the newest modified version of the Privacy Policy each time it’s available, because if you continue to use the Services you are agreeing to be bound by it.

If you don’t agree to be bound by the modified Privacy Policy, then you can’t use the Services anymore. If you object to any change or modification, your sole recourse shall be to cease using the Services. You agree that the Company shall not be liable to you or to any third party for any modification, suspension or discontinuance of the Service. Except as may be expressly specified otherwise by SocioBright Ltd with respect to paid portions of the Services, we reserve the right to add, change, suspend or discontinue the Services, or any aspect or feature of the Services, without notice or liability.

## 2.10. How to contact us

If you have any questions about this Privacy Policy, please contact us on [legal@privetalk.com](mailto:legal@privetalk.com). In your email please include your full name, company, country of residence, contact telephone number. Our customer service team will be glad to be provide you support in a timely and efficient manner.

## 2.11. Last Revision Date

This document was last revised on October 14th, 2016.