

HELP-FULL PRIVACY POLICY

1. INTRODUCTION

Help-Full brings together people in the community to provide and receive neighborly services from one another. Use of Help-Full is limited to Members whose use of Help-Full services is subject to specified terms and conditions.

Your privacy is important to us. This notice of Privacy Practices (“Privacy Practices”) explains Help-Full’s privacy and security policies and our procedures regarding the collection, use and disclosure of personal information we receive from users of Help-Full, including the following:

- What information we collect
- How the information is used
- How we secure the information we collect

The Privacy Practices may be updated from time to time. Whenever we make changes, we will notify you by posting the updated policy on Help-Full website and revising the “Updated” date above. We suggest you review this Privacy Policy whenever you use the Site to stay informed about our information practices.

As used in this Notice of Privacy Practices, the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analyses, and using or handling information in any way, including but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information.

If you live in the United States or Canada, the company that is responsible for your information under this Privacy Policy is:

Help-Full, Inc.
PO Box 11182
Oakland, CA 94611

If you live outside the United States or Canada, the company responsible for your information is:

Help-Full, Inc.
PO Box 11182
Oakland, CA 94611

2. PRIVACY AND HOW WE COLLECT YOUR INFORMATION

Our primary goals in collecting information are to provide and improve Help-Full Services, our Site features and content, administer your use of Help-Full Services and to enable users to enjoy and easily navigate the Site.

You choose to give us certain information when using our services. This includes:

- When you register with us through Help-Full to become a Member, we will ask you for personally identifiable information. This refers to information about you that can be used to contact or identify an individual (“Personal Information”). Personal Information includes, but is not limited to your name, age, gender, address, and your email address. We use your Personal Information mainly to provide Help-Full Services and to administer your inquiries.
- We also collect other Personal Information that you provide as part of your registration and for administration and personalization of your Account, including your needs and preferences, as well as services that you are willing to provide to others.
- When you complete your profile, you can share with us additional information, such as details on your personality, lifestyle, interests and other details about you, as well as content such as photos and videos. To add certain content, like pictures or videos, you may allow us to access your camera or photo album. Some of the information you choose to provide us may be considered “special” or “sensitive” in certain jurisdictions, for example your racial or ethnic origins, sexual orientation and religious beliefs. By choosing to provide this information, you consent to our processing of that information.
- In addition, we may also collect information which on its own is not identifiable to you (e.g., zip code (“Non-Identifying Information”).
- If you are acting in a caregiver role on behalf of another individual, then we will also collect Personal Information about that individual. By providing any Personal Information related to that individual about whom you create a Beloved Profile, you agree that you have obtained the applicable and appropriate permission, releases and consents from such individual to the extent necessary to provide such individual’s Personal Information to Help-Full as part of your use of Help-Full Services.
- When you subscribe to a paid service or make a purchase directly from us (rather than through a platform such as iOS or Android), you provide us or our payment service provider with information, such as your debit or credit card number or other financial information.
- When you participate in surveys or focus groups, you give us your insights into our products and services, responses to our questions and testimonials.
- When you choose to participate in our promotions, events or contests, we collect the information that you use to register or enter.
- If you contact our customer care team, we collect the information you give us during the interaction. Sometimes, we monitor or record these interactions for training purposes and to ensure a high quality of service.
- If you ask us to communicate with or otherwise process information of other people (for example, if you ask us to send an email on your behalf to one of your

friends), we collect the information about others that you give us in order to complete your request.

- We also process your chats with other users as well as the content you publish, as part of the operation of the services.

3. INFORMATION WE RECEIVE FROM OTHERS

In addition to the information you provide us directly, we receive information about you from others, including:

- **Other Users** - Other users may provide information about you as they use our services. For instance, we may collect information about you from other users if they contact us about you.
- **Social Media** - You may be able to use your social media login (such as Facebook or Google Login) to create and log into your Help-Full account. This saves you from having to remember yet another user name and password and allows you to share some information from your social media account with us.
- **Other Partners** - We may receive info about you from our partners, for instance when Help-Full accounts can be created through a partner's websites (in which case they pass along registration information to us) or where Help-Full ads are published on a partner's websites and platforms (in which case they may pass along details on a campaign's success).

4. INFORMATION COLLECTED WHEN YOU USE OUR SERVICES

When you use our services, we collect information about which features you've used, how you've used them and the devices you use to access our services. See below for more details:

- **Usage Information** - We collect information about your activity on our services, for instance how you use them (e.g., date and time you logged in, features you've been using, searches, clicks and pages which have been shown to you, referring webpage address, advertising that you click on) and how you interact with other users (e.g., users you connect and interact with, time and date of your exchanges, number of messages you send and receive).
- **Device Information** - We collect information from and about the device(s) you use to access our services, including:
 - hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs, browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or;
 - information on your wireless and mobile network connection, like your service provider and signal strength;

- information on device sensors such as accelerometers, gyroscopes and compasses.
- **Other information with your consent** - If you give us permission, we can collect your precise geolocation (latitude and longitude) through various means, depending on the service and device you're using, including GPS, Bluetooth or Wi-Fi connections. The collection of your geolocation may occur in the background even when you aren't using the services if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will not collect it.
- Similarly, if you consent, we may collect your photos and videos (for instance, if you want to publish a photo, video or streaming on the services).

5. USE OF COOKIES

Like many websites, we use “cookies” to provide you with functionality and to collect information. A cookie is a small data file saved to your computer for record-keeping purposes. We use cookies for two purposes. First, we use persistent cookies to save your login information for future logins to Help-Full Services. Second, we use session ID cookies to enable certain features of the linkAges and Help-Full Services, to better understand how you interact with Help-Full Services, and to monitor aggregate usage of Help-Full.

You can instruct your browser to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. However, if you do not accept cookies, you will not be able to log on as a registered user, and you will be limited to the functionality provided to guest users.

6. HOW WE USE YOUR INFORMATION

The main reason we use your information is to deliver and improve our services. Additionally, we use your info to help keep you safe and to provide you with offers that may be of interest to you. Read on for a more detailed explanation of the various reasons we use your information

To administer your account and provide our services to you

- Create and manage your account
- Provide you with customer support and respond to your requests
- Complete your transactions
- Communicate with you about our services, including order management and billing

To help you connect with other users

- Analyze your profile and that of other users to recommend meaningful connections

- Show users' profiles to one another

To ensure a consistent experience across your devices

- Link the various devices you use so that you can enjoy a consistent experience of our services on all of them. We do this by linking devices and browser data, such as when you log into your account on different devices or by using partial or full IP address, browser version and similar data about your devices to help identify and link them.

To improve our services and develop new ones

- Administer focus groups and surveys
- Conduct research and analysis of users' behavior to improve our services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behavior)
- Develop new features and services (for example, we may decide to build a new interests-based feature further to requests received from users).

To serve you relevant offers

- Administer sweepstakes, contests, discounts or other offers
- Communicate with you by email, phone, social media or mobile device about products or services that we think may interest you

To prevent, detect and fight fraud or other illegal or unauthorized activities

- Address ongoing or alleged misbehavior on and off-platform
- Perform data analysis to better understand and design countermeasures against these activities
- Retain data related to fraudulent activities to prevent against recurrences

To ensure legal compliance

- Comply with legal requirements
- Assist law enforcement
- Enforce or exercise our rights, for example our Terms

To process your information as described above, we rely on the following legal bases:

- *Provide our service to you:* Most of the time, the reason we process your information is to perform the contract that you have with us. For instance, as you go about using our service to get and give help and build meaningful connections within Help-Full, we use your information to maintain your account and your profile, to make it viewable to other users and recommend other users to you.
- *Legitimate interests:* We may use your information where we have legitimate interests to do so. For instance, we analyze users' behavior on our services to

continuously improve our offerings, we suggest offers we think might interest you, and we process information for administrative, fraud detection and other legal purposes.

- *Consent*: From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Policy.

7. HOW WE SHARE INFORMATION

Since our goal is to help you get and give help and make meaningful connections within Help-Full, the main sharing of users' information is with other users. We also share some users' information with service providers and partners who assist us in operating the services, with other Help-Full, Inc. companies and, in some cases, legal authorities. Read on for more details about how your information is shared with others.

- **With other users** - You share information with other users when you voluntarily disclose information on the service (including your public profile). Please be careful with your information and make sure that the content you share is stuff that you're comfortable being publicly viewable since neither you nor we can control what others do with your information once you share it. If you choose to limit the audience for all or part of your profile or for certain content or information about you, then it will be visible according to your settings.
- **With our service providers and partners** - We use third parties to help us operate and improve our services. These third parties assist us with various tasks, including data hosting and maintenance, analytics, customer care, marketing, advertising, payment processing and security operations. We may also share information with partners who distribute and assist us in advertising our services. For instance, we may share limited information on you in hashed, non-human readable form to advertising partners. All our service providers and partners must agree to strict confidentiality obligations.
- **With other Help-Full businesses** - We share your information with other Help-Full companies to benefit you in two respects:
 - For other Help-Full companies to assist us in processing your information, as service providers, upon our instructions and on our behalf. Assistance provided by other Help-Full companies may include technical processing operations, such as data hosting and maintenance, customer care, marketing and targeted advertising, finance and accounting assistance, better understanding how our service is used and users' behavior to improve our service, securing our data and systems and fighting against spam, abuse, fraud, infringement and other wrongdoings.
 - In order to improve your chances at building significant connections with others, we may make you visible on other Help-Full services or allow you to benefit from cross-platform functionalities. We will of course comply with applicable law and, where relevant, notify you of any such opportunity and allow you to agree or to refuse. Examples of such opportunities may

include the creation of a new service within Help-Full, addressing a specific demographic that we feel would be interesting to you based on your search criteria.

We may also share information with other Help-Full companies for legitimate business purposes such as corporate audit, analysis and consolidated reporting as well as compliance with applicable laws. We may also share user information with other Help-Full companies to remove users who violate our Terms of Use, or have been reported for criminal activity and/or bad behavior. In some instances, we may remove that user from all platforms.

- **For corporate transactions** - We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.
- **When required by law** - We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.
- **To enforce legal rights** - We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.
- **With your consent or at your request** - We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

We may use and share non-personal information (meaning information that, by itself, does not identify who you are such as device information, general demographics, general behavioral data, geolocation in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above circumstances. We may also share this information with other Help-Full, Inc. companies and third parties (notably advertisers) to develop and deliver targeted advertising on our services and on websites or applications of third parties, and to analyze and report on advertising you see. We may combine this information with additional non-personal information or personal information in hashed, non-human readable form collected from other sources.

8. CROSS-BORDER DATA TRANSFERS

Sharing of information laid out in Section 6 sometimes involves cross-border data transfers, for instance to the United States of America and other jurisdictions. As an example, where the service allows for users to be located in the European Economic Area ("EEA"), their personal information is transferred to countries outside of the EEA.

We use standard contract clauses approved by the European Commission or other suitable safeguard to permit data transfers from the EEA to other countries. Standard contractual clauses are commitments between companies transferring personal data, binding them to protect the privacy and security of your data.

9. YOUR RIGHTS

We want you to be in control of your information, so we have provided you with the following tools:

- Access / Update tools in the service. Tools and account settings that help you to access, rectify or delete information that you provided to us and that's associated with your account directly within the service. If you have any question on those tools and settings, please contact our customer care team for help [here](#).
- Device permissions. Mobile platforms have permission systems for specific types of device data and notifications, such as phone book and location services as well as push notifications. You can change your settings on your device to either consent or oppose the collection of the corresponding information or the display of the corresponding notifications. Of course, if you do that, certain services may lose full functionality.
- Deletion. You can delete your account by using the corresponding functionality directly on the service.

We want you to be aware of your privacy rights. Here are a few key points to remember:

- Reviewing your information. Applicable privacy laws may give you the right to review the personal information we keep about you (depending on the jurisdiction, this may be called right of access, right of portability or variations of those terms). You can request a copy of your personal information by putting in such a request [here](#).
- Updating your information. If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion or object to its processing, please contact us [here](#)

For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. If you wish to receive information relating to another user, such as a copy of any messages you received from him or her through our service, the other user will have to contact our Privacy Officer to provide their written consent before the information is released.

Also, we may not be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you anymore.

- Uninstall. You can stop all information collection by an app by uninstalling it using the standard uninstall process for your device. If you uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.
- Accountability. In certain countries, including in the European Union, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how we process your personal information. The data protection authority you can lodge a complaint with notably may be that of your habitual residence, where you work or where we are established.

10. HOW WE PROTECT YOUR INFORMATION

We work hard to protect you from unauthorized access to or alteration, disclosure or destruction of your personal information. As with all technology companies, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure.

We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organizational security measures.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately [here](#).

11. HOW LONG WE RETAIN YOUR INFORMATION

We keep your personal information only for as long as we need it for legitimate business purposes (as laid out in Section 6) and as permitted by applicable law.

In practice, we delete or anonymize your information upon deletion of your account, unless:

- we must keep it to comply with applicable law;
- we must keep it to evidence our compliance with applicable law;
- there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
- the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behavior or security incidents from opening a new account.

Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

12. CHILDREN'S PRIVACY

Our services are restricted to users who are 18 years of age or older. We do not permit users under the age of 18 on our platform and we do not knowingly collect personal information from anyone under the age of 18. If you suspect that a user is under the age of 18, please contact us [here](#).

13. PRIVACY POLICY CHANGES

Because we're always looking for new and innovative ways to help you build meaningful connections, this policy may change over time.

14. HOW TO CONTACT US

If you have questions about this Privacy Policy, here's how you can reach us:

Online: [here](#)

By post:

Help-Full, Inc.
PO Box 11182
Oakland, CA 94611

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