

## Dipsea Privacy Policy

**Effective Date of Current Policy: November 26, 2018**

### 1. PURPOSE

This Privacy Policy is incorporated by reference into the Dipsea Terms of Service (the “**Terms**”). The terms “Dipsea,” “we,” and “us” refer to Dipsea Inc. This Privacy Policy explains our online and offline information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can opt-out of a use or correct or change such information. All other terms not defined in this Privacy Policy will have the meanings set forth in the Terms.

### 2. SCOPE

This Privacy Policy applies to any information relating to an identified or identifiable natural person (“**Personal Information**”) that is collected, recorded, organized, structured, stored, adapted or altered, retrieved, consulted, used, disclosed by transmission, dissemination or otherwise made available, aligned or combined, restricted, erased, destroyed, or subject to any other operation performed upon Personal Information, whether or not by automatic means (“**Processed**”) by Dipsea in the course of our business, including on the Dipsea website (our “**Site**”) and our mobile application (our “**App**”) (together with any and all future online and offline offerings operated by or on behalf of Dipsea, the “**Services**”). All individuals whose responsibilities include the Processing of Personal Information on behalf of Dipsea are expected to protect that data by adherence to this Privacy Policy.

### 3. TRANSPARENCY/NOTICE—TYPES OF PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

The types of Personal Information we may collect (directly from you or from third-party sources) and our privacy practices depend on the nature of the relationship you have with Dipsea and the requirements of applicable law. Some of the ways that Dipsea may collect Personal Information include:

- You may provide Personal Information directly to Dipsea through interacting with the Services.
- As you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.

We endeavor to collect only that information which is relevant for the purposes of Processing. Below are the ways we collect Personal Information and how we use it.

#### 3.1 TYPES OF PERSONAL INFORMATION WE COLLECT

Dipsea collects Personal Information regarding its current, prospective, and former users and visitors to our Site.

- **Information You Provide Directly to Us.** When you use the Services or engage in certain activities, such as registering for an Account with Dipsea, requesting Services or information, or contacting us directly, we may ask you to provide some or all of the following types of information:
  - **Communications with Us.** We may collect Personal Information from you such as your email address when you choose to request information about our Services, or register for Dipsea’s waitlist or newsletter, request to receive customer or technical support, or otherwise communicate with us.

- **Automatic Data Collection.** We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, IMEI, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.
- **Information from Other Sources.** We may receive information about you from other sources, including through third-party services and organizations to supplement information provided by you. For example, if you access our Services through a third-party application, such as an App Store or SNS, we may collect information about you from that third-party application that you have made public via your privacy settings. Information we collect through App Stores or SNS accounts may include your name, your SNS user identification number, your SNS user name, location, sex, birth date, email, profile picture, and your contacts on the SNS. This supplemental information allows us to verify information that you have provided to Dipsea and to enhance our ability to provide you with information about our business and Services.

### 3.2 HOW DIPSEA USES YOUR INFORMATION

We acquire, hold, use, and Process Personal Information about individuals for a variety of business purposes, including:

- **To Provide Services or Information Requested.** Dipsea may use information about you to fulfill requests for our Services or other information including to:
  - Generally manage individual information and Accounts;
  - Respond to questions, comments, and other requests;
  - Provide access to certain areas, functionalities, and features of Dipsea’s Services;
  - Contact you to answer requests for customer support or technical support.
- **Administrative Purposes.** Dipsea may use Personal Information about you for its administrative purposes, including to:
  - Measure interest in Dipsea’s Services;
  - Develop new Services;
  - Ensure internal quality control;
  - Verify individual identity;
  - Communicate about individual Accounts and activities on Dipsea’s Services and systems, and, in Dipsea’s discretion, changes to any Dipsea policy;
  - Send email to the email address you provide to us to verify your Account and for informational and operational purposes, such as Account management, customer service, or system maintenance;
  - Process payment for purchases related to our Services;
  - Process transactions;
  - Prevent potentially prohibited or illegal activities;
  - Enforce our Terms.

- **Marketing Dipsea Services.** Dipsea may use Personal Information to provide you with materials about offers and Services that may be of interest, including new content or Services. Dipsea may provide you with these materials by phone, postal mail, facsimile, or email, as permitted by applicable law. Such uses include:
  - To tailor content, advertisements, and offers;
  - To notify you about offers and services that may be of interest to you;
  - To provide Services to you and our sponsors;
  - For other purposes disclosed at the time that individuals provide Personal Information;
  - or
  - Otherwise with your consent.

You may contact us at any time to opt-out of the use of your Personal Information for marketing purposes, as further described in Section 5 below.

- **Research and Development.** Dipsea may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing Services or develop new Services. From time to time, Dipsea 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, and the information collected will be used for research and reporting purposes to help us better serve individuals by learning more about their needs and the quality of our Services. The survey responses may be utilized to determine the effectiveness of our Services, various types of communications, advertising campaigns, and/or promotional activities. If an individual participates in a survey, the information given will be used along with that of other study participants. We may share anonymous individual and aggregate data for research and analysis purposes.
- **Services via Mobile Devices.** Dipsea provides Services that are specifically designed to be compatible and used on mobile devices, including our App. Dipsea will collect certain information that your mobile device sends when you use such Services, like a device identifier, user settings, location information, mobile carrier, and the operating system of your device. Information about use of mobile versions of the Services may be associated with your Account.
- **Anonymous and Aggregated Information Use.** Dipsea may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Dipsea’s Services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Services. Anonymized or aggregated information is not Personal Information, and Dipsea may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Dipsea and with third parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.
- **Sharing Content with Friends or Colleagues.** Dipsea’s Services may offer various tools and functionalities. For example, Dipsea may allow you to forward or share certain content with a friend, such as an email inviting your friend to use our Services. Email addresses that you may provide for a friend or colleague will be used to send your friend or colleague the content or link you request, but will not be collected or otherwise used by Dipsea or any other third parties for any other purpose.
- **Other Uses.** Dipsea may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, anti-fraud protection, or any other purpose

disclosed to you at the time you provide Personal Information or with your consent.

### 3.3 COOKIES, PIXEL TAGS/WEB BEACONS, ANALYTICS INFORMATION, AND INTEREST-BASED ADVERTISING

We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a “device”) that allow us to record certain pieces of information whenever you visit or interact with our Services, and to recognize you across devices.

- **Cookies.** Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Site may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Site that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.
- **Social Media Widgets:** Our Site includes social media features such as the Facebook “Like” button and LinkedIn (that might include widgets such as the share this button or other interactive mini-programs). These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.
- **Analytics.** We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt out of Google’s collection and Processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Our uses of such Technologies fall into the following general categories:

- **Operationally Necessary.** We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our Site and App. This includes technologies that allow you access to our Site and App; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of certain functions such as saved search;
- **Performance Related.** We may use cookies, web beacons, or other similar technologies to assess the performance of our Site and App, including as part of our analytic practices to help us understand how our visitors use our Site, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our Services;
- **Functionality Related.** We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our Site and App. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or content viewed so that we may enhance the presentation of content

on our Services;

If you would like to opt-out of the Technologies we employ on our Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

### **3.4 THIRD-PARTY SERVICES**

The Site may contain links to other websites and other websites may reference or link to our Site or other Services. These other domains and websites are not controlled by us, and Dipsea does not endorse or make any representations about Third-Party websites or social media platforms. We encourage our users to read the privacy policies of each and every website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Dipsea's Services may contain links and interactive features with various social media platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using our Site or other Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by third parties for any number of purposes.

### **3.5 THIRD-PARTY PAYMENT PROCESSING**

We sell Subscriptions (as defined in our Terms) to our Services. When you make purchases through the Services, we process your payments through a third-party application, including the Apple App Store (together with any similar applications, "**App Stores**"). The third-party application may collect certain financial information from you to process a payment on behalf of Dipsea, including your name, email address, address and other billing information.

## **4. ONWARD TRANSFER—DIPSEA MAY DISCLOSE YOUR INFORMATION**

### **4.1 INFORMATION WE SHARE**

We may share your information as described in this Privacy Policy (e.g., with our third-party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

- **We Use Vendors and Service Providers.** We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Site and App. Dipsea has executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.
- **Business Partners.** Dipsea may share Personal Information with our business partners and affiliates for our and our affiliates' internal business purposes or to provide you with a service

that you have requested. Dipsea may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Dipsea. Dipsea requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Dipsea provided them.

- **Marketing – Interest-Based Advertising and Third-Party Marketing.** Through our Services, Dipsea may allow third-party advertising partners to set tracking tools (e.g., cookies) to collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such de-identified information as well as selected Personal Information (such as demographic information and past purchase history) we have collected with third-party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit non-Dipsea related websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We may allow access to other data collected by the Site to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer that we do not share your Personal Information with third-party advertising partners, you may opt-out of such sharing at no cost by following the instructions in Section 5 below.
- **Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures).** We may access, preserve, and disclose your Personal Information, other Account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce Dipsea policies or contracts; (v) to collect amounts owed to Dipsea; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.

In addition, from time to time, server logs may be reviewed for security purposes—e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, Dipsea will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

## 4.2 DATA TRANSFERS

All Personal Information collected via or by Dipsea may be stored anywhere in the world, including but not limited to the United States, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or

other authorities pursuant to a lawful request. By providing information to Dipsea, you consent to the storage of your Personal Information in these locations.

## **5. OPT-OUT (RIGHT TO RESTRICT PROCESSING)**

### **GENERAL**

You have the right to opt out of certain uses and disclosures of your Personal Information. Where you have consented to Dipsea's Processing of your Personal Information, you may withdraw that consent at any time and opt-out to further Processing by contacting [support@dipseastories.com](mailto:support@dipseastories.com). Even if you opt-out, we may still collect and use non-Personal Information regarding your activities on our Sites and/or information from the advertisements on third-party websites for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

### **EMAIL AND TELEPHONE COMMUNICATIONS**

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt-out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding Services you have requested. We may also send you certain non-promotional communications regarding Dipsea and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).

### **MOBILE DEVICES**

Dipsea may occasionally send you push notifications through our App with other notices that may be of interest to you. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device. Dipsea may also collect location-based information if you use our App. You may opt-out of this collection by changing the settings on your mobile device.

### **"DO NOT TRACK"**

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

### **COOKIES AND INTEREST-BASED ADVERTISING**

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, App users may opt out of certain mobile ads via their device settings.

The online advertising industry also provides websites from which you may opt-out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice

and privacy, at [www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp), or <http://www.youronlinechoices.eu/> and [www.aboutads.info/choices/](http://www.aboutads.info/choices/). You can also choose not to be included in Google Analytics [here](#).

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted-out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt-out on each device. Advertisements on third-party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on anonymous, non-Personal Information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt-out of the advertising partners' use of this information for interest-based advertising purposes.

## **6. RIGHTS OF ACCESS, RECTIFICATION, ERASURE, AND RESTRICTION**

You may inquire as to whether Dipsea is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend or delete your Personal Information where it is inaccurate. Where otherwise permitted by applicable law, you may send an e-mail to [support@dipseastories.com](mailto:support@dipseastories.com) or use any of the methods set out in this Privacy Policy to request access to, receive (port), seek rectification, or request erasure of Personal Information held about you by Dipsea. Please include your full name, email address associated with your Account, and a detailed description of your data request. Such requests will be processed in line with local laws.

Although Dipsea makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which Dipsea is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question or where it is commercially proprietary. If Dipsea determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Dipsea will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

## **7. DATA RETENTION**

Dipsea retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## **8. SECURITY OF YOUR INFORMATION**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. If we

learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing.

**9. CHILDREN’S PRIVACY**

The Services are not directed to users under 18, and Dipsea does not knowingly collect Personally Identifiable Information from children under 13 (and in certain jurisdictions under the age of 16) years of age. If you are under the age of 18, you must have your parent’s permission to access the Services. Dipsea urges parents to instruct their children never to give out their real names, addresses, or phone numbers, without parental permission, when online. If you learn that your child has provided us with Personal Information without your consent, you may alert us at support@dipseastories.com. If we learn that we have collected any Personal Information from children under 13 (and in certain jurisdictions under the age of 16), we will promptly take steps to delete such information and terminate the child’s Account.

**10. REDRESS/COMPLIANCE AND ACCOUNTABILITY**

If you have any questions about our privacy practices or this Privacy Policy, please contact Dipsea by email at support@dipseastories.com. We will address your concerns and attempt to resolve any privacy issues in a timely manner.

**11. CHANGES TO OUR PRIVACY POLICY AND PRACTICES**

This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the updated Privacy Policy is posted on the Services. If at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the Services.

- **Revision to the Privacy Policy.** We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit this Site and use the services made available to you after such changes have been made, you hereby provide your consent to the changes.
- **Posting of Revised Privacy Policy.** If there are any material changes to this Privacy Policy, Dipsea will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.
- **New Uses of Personal Information.** Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt-out. Where consent of the individual for the Processing of Personal Information is otherwise required by law or contract, Dipsea will endeavor to comply with the law or contract.

**12. REVISION HISTORY**

Title (Effective Date)	
Dipsea Privacy Policy	Effective: 11/26/2018

