

## SAFEFUN PRIVACY POLICY

Last modified: February 8, 2020

SafeFun, LLC (collectively, “**SafeFun**”) operate the SafeFun mobile application (“**App**”), the www.safefun.com, verifier.safefun.com, app.safefun.com, store.safefun.com, and consumer.safefun.com websites (collectively, the “**Site**”), and the Covid test result verification services offered through our platform (together with the App and the Site, the “**Services**”).

SafeFun respects and protects the privacy of the users that use our Services. We maintain strict policies to ensure the privacy of those who use our Services (“**End Users**”) or those who may just be visiting our Site (“**Visitors**”). This policy (“**Privacy Policy**”) describes the types of information we may collect from you and our practices for how we collect, use, maintain, protect, and disclose such information. The way that we collect and use your information depends on the way you access the Services (whether by Site or by App). This Privacy Policy also includes a description of certain rights that you may have over information that we may collect from you.

By using the Services, you agree to this Privacy Policy. If you do not agree with our policies and practices, your choice is to not use our Services.

Summary						
This chart is a summary of data collected and data disclosed. The rest of this Privacy Policy provides additional information on our privacy practices.						
Categories of Personal Information	Collection		Disclosure		Sale	
	Do we collect?	Collected in past 12 months	For a business purpose	For a business purpose in past 12 months	Do we sell?	Sold in past 12 months
Identifiers: IP addresses; cookies, beacons, pixel tags, mobile ad identifiers, customer numbers, unique pseudonyms, user aliases, and telephone numbers.	YES	YES	YES	YES	NO	NO
Categories of PI described in Section 1798.80(e) of the CCPA (including name, email, phone number, mailing address, birthday, SSN, driver’s license number, and bank account number)	YES	YES	YES	YES	NO	NO
Commercial information	YES	YES	YES	YES	NO	NO
Geolocation data	YES	YES	NO	NO	NO	NO

Internet or other electronic network activity information	YES	YES	YES	YES	NO	NO
Inferences drawn from other personal information to create a profile about a consumer.	NO	NO	NO	NO	NO	NO
Characteristics of protected classifications under California or federal law	YES	YES	YES	YES	NO	NO
Biometric information	NO	NO	NO	NO	NO	NO
Audio, visual or similar information	NO	NO	NO	NO	NO	NO
Professional or employment related information	NO	NO	NO	NO	NO	NO
Non-public education information (per the Family Educational Rights and Privacy Act)	NO	NO	NO	NO	NO	NO

<b>Information that SafeFun Collects</b>		
<b>Types of Information Collected</b>	Personal Data	<p>“Personal Data” is information by which you may be personally identified. If you are a California resident, this is data that identifies, relates to, or could reasonably be linked with you or your household. SafeFun may collect the following Personal Data from you:</p> <ul style="list-style-type: none"> <li>• Name;</li> <li>• Email;</li> <li>• Phone number;</li> <li>• Zip code;</li> <li>• Birthdate;</li> <li>• Covid negative test results;</li> <li>• Credit card number</li> </ul>
	Personal Information, as defined by CCPA	<p>Personal information is information that identifies, relates to, or could reasonably be linked with you or your household. For example, it could include your name, social security number, email address, records of products purchased, internet browsing history, geolocation data, fingerprints, and inferences from other personal information that could create a profile about your preferences and characteristics.</p>
	Non-Personal Data	<p>Non-personal data includes any data that cannot be used on its own to identify, trace, or identify a person. We may collect your IP Address, device information, or location information.</p>

		When non-Personal Data you give to us is combined with Personal Data we collect about you, it will be treated as Personal Data and we will only use it in accordance with this Privacy Policy.
<b>How we collect information.</b>	<p>We collect information about you in three ways:</p> <p>(1) when you provide it do us directly through an interaction with us, for example:</p> <ul style="list-style-type: none"> <li>• When you register for the Service,</li> <li>• When you participate in surveys, chats, or other forums, and</li> <li>• When you contact us for service requests.</li> </ul> <p>(2) through automated collection methods like cookies or log files; and</p> <p>(3) when we obtain the information through a third party, for example:</p>	
<b>Why we collect and how we use your information. (Legal Basis)</b>	<p>We collect and use your Personal Data when we have a legitimate purpose to do so, including the following reasons:</p> <ul style="list-style-type: none"> <li>• to verify your eligibility to use the Services (age verification, valid test result, etc.);</li> <li>• to confirm identity to use the Services;</li> <li>• to authenticate your identity with third-party service providers (diagnostic laboratories and their online systems) when you explicitly opt-in to allow;</li> <li>• when it is necessary for the general functioning of the Services, including to contact you (or to facilitate payments for business End Users);</li> <li>• when it is necessary in connection with any contract you have entered into with us (including our Terms of Use or when you make a purchase through the site) or to take steps prior to entering into a contract with us;</li> <li>• when we have obtained your prior consent to the use, including to communicate with you about our features and about upcoming events offered by us and our affiliated companies (this legal basis is only used in relation to uses that are entirely voluntary – it is not used for information processing that is necessary or obligatory in any way);</li> <li>• when we have a legitimate interest in processing your information for the purpose of providing or improving our Services;</li> <li>• when have a legitimate interest in using the information for the purpose of contacting you, subject to compliance with applicable law; or</li> <li>• when we have a legitimate interest in using the information for the purpose of detecting, and protecting against, breaches of our policies and applicable laws.</li> </ul> <p>We may use aggregated (anonymized) information about our End Users, and information that does not identify any individual, without restriction.</p>	
<b>Information Collected from Third Parties</b>	<p><i>Information from our service providers:</i> We may receive information about you from third-party service providers that we engage for verification or identification purposes and fraud prevention.</p> <p><i>Information from social media sites and other publicly available sources:</i> When you interact or engage with us on social media sites through posts, comments, questions and other interactions, we may collect such publicly accessible information, including profile information, to allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. We may also add and update information about you, from other publicly available sources.</p>	
<b>Accessing and Controlling Your Information</b>	<p>If you would like to prevent us from collecting your information completely, you should cease use of our Services. You can also control certain data via these other methods:</p> <p>Opt out of non-essential electronic communications: You may opt out of receiving newsletters and other non-essential messages by using the ‘unsubscribe’ function included in all such messages. However, you will continue to receive notices and essential transactional emails.</p> <p>Optional information: You can always choose not to fill in non-mandatory fields when you submit any form linked to our services.</p>	
<b>Your Rights to Your Data</b>	<p>You have the following rights with respect to information that we hold about you. We attempt to provide you the same rights no matter where you choose to live.</p>	

	<p><i>Right to access:</i> You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.</p> <p><i>Right to rectification:</i> You have the right to update the information we hold about you or to rectify any inaccuracies.</p> <p><i>Right to erasure:</i> You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.</p> <p><i>Right to restriction of processing:</i> You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</p> <p><i>Right to data portability:</i> You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.</p> <p><i>Right to object:</i> You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.</p>	
<p><b>Exercise Your Data Rights</b></p>	<p>We acknowledge your right to request access, amendment, or deletion of your data. We also recognize that you have the right to prohibit sale of your data, but we do not sell data.</p> <p>You can exercise the rights described above, by sending an email or mail to the addresses listed in the Contact section below. Only you, or an agent authorized to make a request on your behalf, may make a request related to your personal information.</p> <p>We cannot respond to your request if, (i) we cannot verify your identity; or (ii) your request lacks sufficient details to help us handle the request. We will make our best efforts to respond to your request within 45 days of its receipt. If we cannot respond in 45 days, we will inform you, in writing, the reason for the delay and will respond to your request within 90 days. Any information we provide will only cover the 12-month period preceding the request's receipt.</p> <p>We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We are not obligated to provide responses to your data requests more than twice in a twelve (12)-month period.</p>	
<p><b>How Long do we Store Personal Data?</b></p>	<p>We will only retain your Personal Data for as long as is necessary to fulfill the purposes for which it is collected. This length of time may vary according to the nature of your relationship with us. Personal Data will be purged after four (4) years of nonuse of an account.</p>	
<p><b>Automated Data Collection Methods</b></p>	<p><b>Cookies</b></p>	<p>A cookie is a small file placed on the hard drive of your computer. Cookies are used to help us manage and report on your interaction with the Site. Through cookies, we are able to collect information that we use to improve the Services, keep count of return visits to our website, authenticate your login credentials, manage multiple instances of the Site in a single browser, and tailor your experience on the Services. Cookies may also collect other data such as the date and time you visited the Site, and your current IP address. If you turn off cookies, your experience on the Services may be impaired.</p>
	<p><b>Log Files</b></p>	<p>We use means through the Services to collect IP addresses, browser types, access times, and physical location. We use this information to ensure compliance with various state and international laws. Occasionally, we use the information to improve our Services.</p>

<p><b>Users under the age of 18</b></p>	<p>Our Services are intended for use by all members of a family or household, including persons under the age of 18 (“Child” or “Children”). We require parental consent with respect of our use of a Child’s Personal Data. Thus, when setting up an account, the Child must provide the parent’s email address. We use that email address to contact the Child’s parent(s) to explain:</p> <ul style="list-style-type: none"> <li>• what personal information we collect about their Child;</li> <li>• how we use it and why; and</li> <li>• how the parent can revoke their consent and/or ask that we delete their Child’s account and personal information.</li> </ul> <p>If at this stage, the parent does not object to or withdraw their consent, we will carry out the activity for which that consent was required. If not, we won’t.</p> <p><b>How May Parents Access, Change or Delete Information About Their Children?</b></p> <p>Deleting your Children’s information and their account. If you are a parent, and we need your consent to certain processing of your Children’s personal information, if you:</p> <ul style="list-style-type: none"> <li>• wish us to cease further collection of personal information from your Children;</li> <li>• believe your Children are participating in an activity on the Site that uses their personal information without the parental consent required by law;</li> <li>• wish us to make no further use of the personal information we have collected online from your Children; and/or</li> <li>• no longer wish for your Children to participate as members of the Site,</li> <li>• we will delete your Child’s Profile, and any parental contact information we may hold, on request.</li> </ul> <p><b>Accessing or changing your Child or Children’s account and any personal information we have collected online.</b> Parents may at any time:</p> <ul style="list-style-type: none"> <li>• access or make changes to their Children’s account; or</li> <li>• make changes to the personal information that we have collected online from their children,</li> <li>• by clicking on their Child’s “My Account” link, by contacting us at <a href="mailto:privacy@safefun.com">privacy@safefun.com</a>.</li> </ul> <p>For your Child’s protection, we may need to verify your identity before implementing any request described in this Section. We will try to comply with your request as soon as reasonably practicable.</p>
<p><b>Do Not Track Settings</b></p>	<p>We do not track our Users over time and across third party websites to provide targeted advertising and do not specifically respond to Do Not Track (“DNT”) signals.</p>

<p align="center"><b>Who We Share Data With</b></p>	
<p>We may use aggregated (anonymized) information about our End Users and Visitors, and information that does not identify any individual, without restriction.</p>	
<p>We do not sell or otherwise disclose Personal Data specific personal or transactional information to anyone except as described below:</p>	
<p>Affiliates.</p>	<p>We may, for our legitimate interests, share your information with entities under common ownership or control with us who will process your information in a manner consistent with this Privacy Policy and subject to appropriate safeguards.</p>
<p>Successors in Interest.</p>	<p>We may, for our legitimate interests, share your information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which Personal Data about our End Users is among the</p>

	assets transferred. You will be notified of any such change by a prominent notice displayed on our Services or by e-mail. Any successor in interest to this Privacy Policy will be bound to the Privacy Policy at the time of transfer.	
Law enforcement and other governmental agencies.	We may share your information when we believe in good faith that such sharing is reasonably necessary to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process, or for regulatory compliance or public health contact tracing purposes. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations.	
Service Providers.	We may, for our legitimate interests, share your information with contractors, service providers, third party authenticators, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. A list of some of our service providers is provided below.	
<b>Service Provider</b>	<b>Why we Share</b>	<b>Privacy Practices</b>
Azure	All information you provide to us is stored on our secure servers provided by Microsoft Azure.	<a href="https://privacy.microsoft.com/en-us/PrivacyStatement">https://privacy.microsoft.com/en-us/PrivacyStatement</a>
Cloudmersive	We use Cloudmersive virus scan software to scan files and content for viruses and identify security issues with content.	<a href="https://cloudmersive.com/privacy-policy">https://cloudmersive.com/privacy-policy</a>
Google	We use Google Analytics for Site analytics. Google will use information on our behalf to evaluate the use of our online products and services, to compile reports on the activities within these online products and services and to provide us with further services associated with the use of these online products and services.	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>
Stripe	We may link certain payment information through Stripe. We use Stripe for payment processing and we do not store any credit card or bank account data.	<a href="https://stripe.com/gb/privacy#personal-data-definition">https://stripe.com/gb/privacy#personal-data-definition</a>

### Third-Party Services and Websites

SafeFun is not responsible for the privacy policies or other practices employed by websites linked to, or from, our Site or App nor the information or content contained therein, and we encourage you to read the privacy statements of any linked third party. This includes sharing information via social media websites.

### Data Storage and How SafeFun Protects Your Information

SafeFun stores End User data on our servers including name, email, phone number, zip code, birthdate, Driver's License Number and images of Covid test results. Payment information is processed and stored by our service providers. Personal Data about End Users and Visitors is stored within the United States. If you are using the Services from the EEA or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Data to the United States. The United States may have laws which are different, and potentially not as protective, as the laws of your own country. By providing your Personal Data, you consent to any transfer and processing in accordance with this Privacy Policy.

SafeFun employs physical, electronic, and managerial control procedures to safeguard and help prevent unauthorized access to your information. We choose these safeguards based on the sensitivity of the information that we collect, process and store and the current state of technology. Our outsourced service providers who support our operations are also vetted to ensure that they too have the appropriate organizational and technical measures in place to protect your information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your information transmitted to the Services. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services. In the event that there is breach in the information that we hold; we shall notify of such breach via email or via notice on the Services.

**Changes to the Privacy Policy**

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our End Users' or Visitors' Personal Data, we will notify you through a prominent notice on the Site or App or by email to the primary email address specified in your account . Such changes will be effective when posted. The date the Privacy Policy was last revised is identified at the top of the page. Your continued use of our Services following the posting of any modification to this Privacy Policy shall constitute your acceptance of the amendments to this Privacy Policy. You can choose to discontinue use of the Service if you do not accept any modified version of this Privacy Policy.

**Questions and Comments**

If you have any questions or comments about this Privacy Policy, or if you would like to file a request about the data we hold or file a deletion request, please contact us at [privacy@safefun.com](mailto:privacy@safefun.com).