

## FEELO PRIVACY NOTICE

*Effective date: April 1, 2021*

### OVERVIEW

Feelo (hereinafter - “Feelo”, “we”, “our”, “us”) is a service which helps its users to confess their feelings to others. Service is provided according to the **Terms of Service** and is implemented and provided on different platforms like mobile apps, our website located at <http://feelo.com>, <http://feeloapp.com>, <http://feelo.app> our related social media pages and others. For simplicity we refer to all of these as our “services” in this Privacy Notice.

By using the services, you also agree to our **Terms of Service**. Please make sure that you read and agree with our Terms of Service if you want to use Feelo.

To provide you with the services and contract with you we need your personal data. Feelo is the data controller of the personal data collected, and is responsible for the processing of your personal data. We respect your privacy and are committed to protecting your personal data, and therefore we collect it according to the applicable law.

This Privacy Notice sets out how we collect, use and protect your personal data that you provide to us or that is otherwise generated or obtained by us, in relation to your use of any our services specified by the **Terms of Service**. In this document we describe our privacy practices in plain and simple language avoiding any unnecessary legalese.

### WHO IS FEELO

The company that is responsible for your personal data under this Privacy Notice (the “data controller”) is:

Feelo, Inc.

251 Falls Drive

Wilmington, New Castle, DE 19808

## **APPLICABILITY**

This Privacy Notice applies to personal information collected through our websites, apps and other platforms and services operated by Feelo.

## **PERSONAL DATA WE COLLECT**

### **a) Information you give us**

When you use our mobile apps, visit our website and related social media pages or use any other our services through these or other platforms, subscribe to our news and updates, we ask you to provide us with, in particular:

- your name and username
- age
- sex
- email address
- mobile phone number
- date of birth

While using Feelo service you also provide us with an access to your contacts (phone numbers) in your address book, including those of users of our services and your other contacts. If any of your contacts are not yet using our services, we shall manage this information for you in a way that ensures those contacts shall not be identified by us.

### **b) Information we receive from others**

Aside from the information you provide us directly, we receive information from other users of our services, in particular:

- your mobile phone number

## **HOW WE USE YOUR PERSONAL DATA**

We try to ensure that you receive and enjoy our services in the best possible way. That's why the primary reason we use your information is to render and improve our services. Additionally, we use your information to help keep you safe and to provide you with advertising that may be of interest to you.

Therefore, we use your personal data and other information provided by or obtained from you for the following purposes:

- providing you with our services
- sending you letters with our news, updates, interesting offers of advertising nature
- providing you with discounts on our services
- communicating with you

## LEGAL BASIS FOR THE PROCESSING

We collect and process your personal data for or on the basis of one or more following legal bases:

- a) Conclusion and performance of a contract. By using our services, you have contracted with us through the **Terms of Service**, and therefore we have to process certain personal data to execute the contract and comply with it. Please note, that the provision of your data is a necessary requirement to enter into and execute the **Terms of Service** and therefore - enjoy our services. If you fail to provide us with such the data, you won't be able to use our services.
- b) Legitimate Interests. We may process your personal data for our legitimate interests, in particular protecting our, our users' rights, safety and property; detecting and resolving any security concerns or fraud; complying with any applicable law, act, regulation, other regulatory legal act, any inquiry or remedy; enforcing the **Terms of Service**.
- c) Your explicit consent to the processing. You may choose to give your explicit consent to processing of your personal data by us or a third party for the abovesaid **purposes of the processing**.
- d) Compliance with other obligations set out by applicable law, governmental or other competent bodies' requests.

## HOW WE STORE YOUR DATA

The term of storing and processing your personal data shall depend on the purpose of its processing, as well as on the applicable technology (this applies to cookies). For instance, Feelo will keep and process your personal data related to the provision of our services to you, including based on the **Terms of Service**, within the period of service provision and/or contract validity.

We will store and process your personal data for marketing (advertising) purposes, for providing you with discounts on our services and products as well as for communication purposes for the period up to 3 (three) years - so that you are always be aware of our news, special offers and updates as well as to be in touch with you.

The servers with your data are hosted by our service provider Amazon Web Services, Inc. This service provider is located in the United States and its affiliated companies – throughout the world. From there, your data may be stored in or accessed from multiple countries, including the United States. Whenever your personal data is transferred to other jurisdictions, we and our service provider will ensure that the data is transferred in accordance with this Privacy Notice and as permitted by applicable data protection laws.

Please note, that we don't define the terms of keeping and processing your personal data by third parties, as it completely depends on their approved rules.

#### **WHO WE SHARE YOUR DATA WITH**

To provide you with our services we share your data with some categories of third parties. Such categories of third parties include:

- a) Our service providers. We engage third parties to assist us in operating and enhancing our services. Such third parties help us with hosting and security operations as to your data, delivery our services to you as well as marketing and advertising.
- b) Competent authorities, regulators, law enforcement bodies. Where required or permitted by applicable law we may share your data with competent authorities, regulators and law enforcement bodies.
- c) Other third parties. We can share your data to protect our rights, legitimate interests, property, or safety, and/or that of our users and others.

#### **HOW WE SECURE YOUR DATA**

To secure and protect your personal data, we use reasonable and appropriate technical, physical and organizational safeguards. Such safeguards are designed to facilitate the security of our systems and protect the confidentiality, integrity,

availability and resilience of your personal data. We also engage our service providers to secure and protect your personal data. The above safeguards include:

- the encryption of your personal data where appropriate
- adoption of measures to ensure your personal data is backed up and remains available in the case of a physical or technical incident
- regularly testing, assessment, and evaluation of the effectiveness of our safeguards

## **YOUR CONCENT**

Your explicit consent is one of the legal bases for processing your personal data. You give your consent in different forms, including by entering into the **Terms of Service**.

We may ask you for your consent to process your data. For example, we may ask you to share your information with third parties. In any such event, we will make it clear why we want to process your personal data, including by sharing such information with third parties.

If you have given your consent to process your personal data, you're entitled to withdraw it at any time. Please note that, if the withdrawn consent was given to enter into the **Terms of Service**, you will not be able to use our services.

## **YOUR RIGHTS REGARDING YOUR PERSONAL DATA**

We collect and process your personal data exclusively pursuant to the applicable law. You may exercise your rights provided for by applicable law at any time. You may have, in particular, the following rights.

### **a) Your rights under General Data Protection Regulation**

If you are on the territory of the European Union or on the territory of such countries as: Iceland, Liechtenstein, Norway, Switzerland, then you have the right to:

- withdraw your consent where you have given it
- request an access to and rectification or erasure (right to be forgotten) of your personal data

- in certain circumstances restrict the processing of your personal data or object to processing it
- request data portability
- receive information on the retention term of your personal data or the criteria by which such a term can be determined
- receive information about the source from which your personal data originates, and if applicable, whether it came from publicly accessible sources (if personal data was not received from you)
- lodge a complaint with a competent supervisory authority on the territory you're located in
- not be subject to a decision based solely on automated processing, including profiling, unless it's necessary for entering into or performance of the **Terms of Service** to which you're subject

To get more details about your rights, please make aware of the official text of the [General Data Protection Regulation](#).

#### **b) Your rights under California Consumer Privacy Act ("CCPA")**

If you are on the territory of the state of California, then you have the right to:

- know what categories and specific pieces of personal information we have collected
- know what personal data we are selling
- request to delete any personal data about you that we've collected
- ban any sales of your personal data to third parties from Feelo
- not be discriminated such as: denying goods and services; accrual of various prices including the use of deductions; securement a low level of services.
- submit a request for information about your personal data that we have collected: by submitting your CCPA request by [Access My PI Form](#) or by **calling us**.

If you don't want to transfer any your personal information we have collected to third parties from Feelo, you can fill out **Do Not Sell My Personal Information Form**.

To get more details about your rights, please make aware of the official text of the [California Consumer Privacy Act](#).

**c) Your rights under Nevada Revised Statutes Chapter 603A**

If you are on the territory of the state of Nevada, then you have the right to:

- opt-out from the sale of personal information that we've collected.

If you don't want to transfer any your personal information we have collected to third parties from Feelo, you can fill out [Nevada Opt-Out Right Form](#).

To get more details about your rights, please make aware of the official text of the [Senate Bill 220](#).

## **WHAT ARE COOKIES**

Cookies is a small piece of data that is sent from our website (or from another domain) and is saved by a web browser on your computer, mobile phone, or another portable device. Cookies can be placed, read, and/or written to by our services, or other websites or services that recognize a particular cookie, which allows the website to «remember» or «recognize» a particular browser or device and, in some cases, store information about that browser or device.

## **PURPOSES OF COOKIES**

Cookies help you to make better use of our services, and also help us to better understand you, in particular learn about your preferences and offer you personalized services and goods. Most of web browsers automatically accept cookies, however you can change these settings. A more detailed description of how to do this can be found on the Internet by going to the website of the developer of your browser. Unfortunately, if you disable cookies, the functionality of many websites will not be accessible.

## **HOW LONG COOKIES ARE STORED ON MY SYSTEM**

We use cookies for a number of different purposes. We use both «transient» and «persistent» cookies. We use a transient cookie to identify you during a particular visit to Feelo. Transient cookies expire after a short time, or when you close your web browser after your visit. We use a persistent cookies to help your device remember

information, settings, preferences, or sign-on credentials that you have previously saved. Basically, this type of cookies is saved on your device, so when you close it and start it up again, the cookie is still there.

We don't use web storage, web beacons, flash cookies or other technologies that track your browsing history across multiple apps or websites.

## **WHAT COOKIES WE USE**

Like many other websites, we use the following types of cookies:

- a) Preferences We use cookies to remember your settings and preferences. For example, it may be the language you prefer. They can help you fill out forms on Feelo more easily.
- b) Authentication We use cookies to remind us who you are and to find your account info in our database when you access our services, so that you do not need to log in at every visit. It helps us to provide you with services tailored to your specific needs and interests.
- c) Analytics and performance We use cookies to optimize performance by collecting data on how users interact with our services. We use these details to improve our website functions and understand how you interact with it.
- d) Advertising We may use cookies to optimize our advertising. We use these cookies to show you relevant advertising both on and off our website.

## **THIRD-PARTY COOKIES**

We provide an opportunity for other organizations through our website to post cookies on your device, so that third parties can receive information about your preferences. This is called "third-party cookies". In simple terms third-party cookies are those created and placed by parties (third parties) other than the owner of the website you're visiting. Such personal data is processed in accordance with the processing rules for such third parties.

We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"), on our services. This service uses cookies to make it easier for us to analyze how you

interact with and use our website and services. Google Analytics may collect data such as your IP address, time of visit, whether you are a return visitor, and any referring website or app. The generated information is usually transmitted and stored by Google Inc. on servers that are located in the United States of America and are subject to Google's privacy policies. Google Inc. processes such information in an automated mode and in our interests, we, in turn, based on the results of the analysis of reports, better understand your interests and needs both in our services/products and in the usability of our website.

To learn more about Google Analytics and to learn how to opt out of tracking of analytics by Google [click here](#).

You can find a full list of cookies, the terms of its storage, by whom it is installed and for what purpose, [here](#).

## **MANAGING COOKIES**

You can manage the cookies stored on your device, or turn them off completely, through your browser settings. Please note, that such actions may affect your browsing experience or even prevent you from using our services. All contemporary browsers will let you change your cookie settings to give you full control over whether cookies can be set or not. To learn more, please visit the help chapter of the browser you use.

To learn more about our cookie practices, please make aware of our [Cookie Policy](#).

## **CHILDREN'S PERSONAL DATA**

Our services are designed only for users who are 17 years or older. Anyone under 17 is not permitted to use the services and we do not purposely collect personal data from children under 17. By using the services, you represent that you are 17 years or older.

## **PAYMENT INFORMATION**

Any payment made by users to access our services and products are processed by our payment providers (third parties). When you make a payment, for instance through Apple Pay service, which is processed by a payment provider, you'll provide that third party with your debit or credit card number and other financial information. Such

information will be stored and processed by that third parties pursuant to their privacy policy and terms of use. Please note that we don't have access to your financial or other information provided by you to a payment provider. If we receive in some way such the information, we'll definitely communicate it to you.

### **LINKS TO OTHER WEBSITES**

On our website we can post links to other websites, in particular to our pages on social networks. In this case, we do not establish the rules for processing your personal data, which can be collected on such websites or social networks, and we cannot be responsible for such processing. For more detailed information you can make aware of the privacy rules of the respective websites and social networks.

### **CONTACT DETAILS**

If you have any questions regarding the processing of your personal data or you wish to delete your data from the mailing list or other databases, or you want to communicate personal data breach to us, you can contact us at any time on any of the contacts listed below:

#### **Feelo, Inc.**

Tel. +13028035844

Email: [mail@feelo.com](mailto:mail@feelo.com)

Address: 251 Falls Drive, Wilmington, New Castle, DE 19808

In addition, we have appointed a data protection officer ("DPO") who is responsible for, in particular, responding to questions, requests, and concerns in relation to our Privacy Notice and use of your personal data. You may contact the DPO as follows:

Data Protection Officer: Oleksii Vasylenko

Tel. +13028035844

Email: [mail@feelo.com](mailto:mail@feelo.com)