

Privacy Policy

We value your privacy and are dedicated to protecting your information and providing you with notice about our information collection and use practices, and how you have a choice to opt-in/out of any marketing or promotional contact from us. By voluntarily sharing personally identifiable information by means of registering and/or using the SpapSCII App (the “App”) and/or any Services (together the “Services”), you agree to the following privacy policy.

What information do we collect?

- **Communications with us.**

If you communicate with us, we collect the information and content you provide to us, including personally identifying information such as your name, email or other contact information. You can provide anonymous feedback by using an email account that does not reveal your identity;

What do we use your information for?

Any of the information we collect from you may be used in one of the following ways:

- To provide, improve, test, and monitor the effectiveness of our Service.
- To develop and test new products and features.
- To announce new features or issues with the app or to announce other apps created by Winkpass.
- To diagnose or fix technology problems.

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the service requested.

How do we protect your information?

We implement a variety of security measures to maintain the safety of your personal information when you use this app.

We offer the use of a secure server. All supplied information is transmitted via Secure Socket Layer (SSL) technology and then encrypted and stored on servers run by Google as part of their cloud hosting service. Although we strive to use the best commercially acceptable means of protecting this data, remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Do we disclose any information to outside parties?

- **Disclosure of Personal Information.**

Winkpass may disclose Personally Identifiable Information and/or any other information if required to do so by law or in the good-faith belief that such action is necessary to prevent injury or property damage.

- **Information Sharing and Third Party Service Partners.**

Winkpass does not rent, sell, or share personal information about you with other people or non-affiliated companies without your consent, other than as set forth in this Privacy Policy or any Agreement with you, or unless we have a good faith belief that access, use, preservation, or disclosure is reasonably necessary to (a) provide you any Service you may request via the App; (b) satisfy any law, regulation, legal process or governmental request, (c) enforce any applicable Terms of Service (including investigation of potential violations thereof), or (d) detect, prevent or otherwise address fraud, security, or technical issues. Winkpass may provide services for the App through contractual arrangements with affiliates, service providers, partners and other third parties ("Service Partners"). Winkpass and its Service Partners use your Personal Information to operate and deliver their products and services. Unless otherwise agreed by you in a separate agreement, Winkpass's Service Partners may not use your Personal Information to inform you of other products or services available from those Service Providers. If Winkpass becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal

information involved in such transactions and provide reasonable notice before personal information is transferred and becomes subject to a different privacy policy. Such notice may be given by a clear and concise statement on Winkpass's website or in a subsequent update to the App that there has been an update to this Privacy Policy.

California Online Privacy Protection Act Compliance

Because we value your privacy we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

As part of the California Online Privacy Protection Act, all users of our app may make any changes to their information at any time by logging into the App and editing their details.

Children's Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our app, products and services are all directed to people who are at least 13 years old or older.

Online Privacy Policy Only

This online privacy policy applies only to information collected through our app and not to information collected offline.

Legal basis for processing (for EEA users)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any

processing that has already taken place. Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

Your Consent

By using our app, you consent to our privacy policy.

Changes to our Privacy Policy

If we decide to change our privacy policy, we will post those changes on this page, and/or update the Privacy Policy modification date below.

Contacting Us

If there are any questions regarding this privacy policy or if you wish to have all your data permanently deleted you may contact us using the feedback link from the App under Settings or by emailing our data protection officer at:

privacy@winkpass.com

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