

*Last updated: July 21, 2016*

## **Privacy Policy**

Alec's App LLC ("we," "us") is concerned about privacy issues and want you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through CarPo application ("App"), our social media pages, as well as HTML-formatted email messages that we send to you or receive from you (collectively, the "Platform"). Please note that the Privacy Policy applies only to our online information-gathering and dissemination practices in connection with the Platform, and does not apply to any of our practices conducted offline. If you have any questions or comments about the Privacy Policy or our privacy practices, please contact us at [ucarpo@outlook.com](mailto:ucarpo@outlook.com).

**1. Acceptance of terms.** Your use of the Platform, signifies that you agree with all the terms of this Privacy Policy, so please do not use the Platform, if you disagree with any part of this Privacy Policy.

**2. Personal Information.** We automatically track certain basic information about our users and their in-app actions. We use this information to do internal research on our members' usage patterns, interests and general behavior to better understand and serve you and our community. When you sign up for CarPo's user account ("User Account"), we collect the following information about you and your use of the App:

- your email;
- your first and last name;
- your telephone number;
- gender;
- birth date;
- name of college/university and graduating class year;
- photo you upload;
- additional information shared by you;
- a password selected by you;
- credit/debit card information;
- make, model, year, plate number, and color of your car (applicable to Drivers only);

Your credit/debit card information will be transferred to a third party that handles payments for us. To keep your credit/debit card information safe and secure, we do not store full credit/debit card information on our servers.

If you decide to sign up for a User Account using your Facebook account, we will also get basic information from your Facebook profile like your name, gender, profile photo, and Facebook friends.

**3. Other Information.** We may collect information such as

- your location;
- contacts from your device's phonebook (with your consent);

- images and other information from your device’s camera and photos (with your consent);
- message(s) you send to us;
- information we receive from other members or third parties about your activities or posting(s) in the App;
- information we receive from other sources, such as public databases, joint marketing partners, social media platforms, from people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties.

**4. Third Party Partners.** We currently contract with online partners to help manage and optimize our business and communications. We use the services of App analytics partners to help us measure the effectiveness of our advertising, and how visitors use the App. We may receive additional information about you, such as demographic data, payment information, or fraud detection information, from third party partners and combine it with other information that we have about you.

**5. Use of Personal Information.** We use the information we collect about you:

- To respond to your inquiries and fulfill your requests;
- To keep a record of your contact information and correspondence, and use it to respond to you, if you contact us through the Platform;
- To send administrative information, for example, information regarding the Platform and changes to our terms, conditions, and policies;
- To allow you to send Platform-related content to a friend through the Platform. By using this functionality, you are telling us that you are entitled to use and provide us with your friend's name and email address;
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, enhancing, improving or modifying our Platform, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities;
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce App’s Terms of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain;
- To create a better, more personalized experience for you based on your individual usage habits, improve our marketing and promotional efforts, analyze App usage, and customize our App's content and layout in order to better meet your needs;
- To use for promotional, sales or any use that we consider appropriate, your correspondence with us, or photographs submitted for publication in the App;
- To send you text messages and push notifications;
- Facilitate transactions and payments.

**6. Disclosure of Personal Information.** We may disclose the information we collect about you:

- To our affiliates for the purposes described in this Privacy Policy, consistent with our goal of providing the highest level of service;
- To our third-party service providers that provide services such as App hosting, Platform-related consulting and monitoring, data analysis, information technology and related infrastructure, customer service, email delivery, auditing and other similar services;
- To identify you to anyone to whom you send messages through the Platform;
- Posted by you on the Platform or provided by you through registration process. Please note that any information you post or disclose through the Platform will become public information, and may be available to us, to users of the Platform and to the general public. We urge you to be very careful when deciding to disclose your Personal Information and Other Information, or any other information, on the Platform;
- To a third party (whether affiliated or unaffiliated with us) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or membership interest (including in connection with any bankruptcy or similar proceedings);
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce App's Terms of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; (g) to allow us to pursue available remedies or limit the damages that we may sustain; and (h) respond to claims that any posting or other content of our Site violates the rights of third parties, including without limitation providing information necessary to satisfy the notice and counter-notice procedures pursuant to the Digital Millennium Copyright Act. You authorize us to disclose any information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us or you to legal liability. Without your affirmative consent, we do not sell, rent or otherwise share your personally identifiable information with other third parties, unless otherwise required as described above;
- To a third party to facilitate transaction and payment.

**7. Collection of Personal Information and Other Information.** We and our third party service providers may collect information about you in a variety of ways, including:

- Through your browser or device: certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type, screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Platform (such as the App) you are using. We use this information to ensure that the Platform functions properly;
- Through mobile sensor data: we collect from CarPo Drivers' devices data (such as speed, direction, height, and acceleration) to improve location accuracy and analyze usage patterns;
- Using cookies: cookies are pieces of information stored directly on the device that you are using. We may use cookies in connection with the Platform;

- Using pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used in connection with the Platform to, among other things, track the actions of users of the Platform (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Platform and response rates;
- IP Address: your "IP Address" is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Platform, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice and is done automatically by many websites and applications. We use IP Address for purposes such as calculating usage levels of the Platform, helping diagnose server problems, and administering the Platform;
- From you: information, such as your location, as well as other information, such as your preferred means of communication, is collected when you voluntarily provide this information. Unless combined with Personal Information, this information does not personally identify you or any other user of the Platform;
- By aggregating information: aggregated Personal Information does not personally identify you or any other user of the Platform;

**8. Use and Disclosure of Other Information.** Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it as described in Section 5, as well as for all the purposes for which we use and disclose Personal Information. In some instances, we may combine Personal Information and Other Information (such as combining your name with your geographical location). If we combine any Personal Information and Other Information, the combined information will be treated by us as Personal Information as long as it is combined. We use and disclose your location to match Drivers and Riders, to determine pick up and drop off locations, and to help protect the User or a member of the public.

**9. Sharing information between Riders and Drivers.** Riders and Drivers are able to see basic information about each other, such as names, photo, ratings, and any information they have added to their profiles. Riders and Drivers who connect their User accounts to Facebook will also be able to see their mutual Facebook friends during the ride. Drivers see the pick-up and drop-off location that the Rider has provided. Riders see a Driver's vehicle information and real-time location as the Driver approaches the pick-up location.

**10. Location information.** While you can prevent your device from sharing location information at any time through your Device's operating system settings, Rider and Driver location is core to the Platform and without it we cannot provide our Services to you.

**11. Rider's Feedback.** Rider shall rate and review Driver at the end of every ride. We receive information about ratings and reviews and give Riders information about Drivers' ratings and reviews.

**12. Payment information.** All payments are facilitated through a third party payment processing company. Your information is subject to third party payment processing's terms of use and privacy policy. Please see third party payment processing's policies for how your data may be used.

**13. Third party services.** This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site, application or service to which the Platform link. The inclusion of a link on the Platform does not imply endorsement of the linked site, application or service by us or by our affiliates. Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as any application, social media platform, or wireless service provider, including any personal information you disclose to other organizations through or in connection with the Platform.

**14. Security.** We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the Section 24.

**15. Your choice regarding our use of your Personal Information for marketing purposes.** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these marketing-related emails by contacting us by email at [ucarpo@outlook.com](mailto:ucarpo@outlook.com). We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you do opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

**16. How you can change or suppress your Personal Information.** You may request to correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through the Platform, or object to the use or processing of such Personal Information by us. In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed.

**17. Retention period.** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. We will retain in our files information you may have requested us to remove if, in our

discretion, retention of the information is necessary to resolve disputes, troubleshoot problems or to enforce the Terms of Use. Furthermore, your information is never completely removed from our databases due to technical and legal constraints (for example, we will not remove your information from our back up storage).

**18. Use of electronic communication by minors.** The Platform is not directed to individuals under the age of thirteen (13), and we request that these individuals not provide Personal Information through the Platform. We restrict Platform to persons 18 years or older.

**19. Cross-border transfer.** The Platform is controlled and operated by us from the United States, and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Platform you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

**20. Sensitive information.** We ask you not to send us, and not to disclose, any sensitive Personal Information (*e.g.*, Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through the Platform or otherwise to us.

**21. Updates to this privacy policy.** We may change this Privacy Policy. Please take a look at the "*Last Updated*" legend at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy in the App. Your use of the Platform following these changes means that you accept the revised Privacy Policy.

**22. Dispute Resolution.** Any dispute, claim or controversy arising out of or relating to this Privacy Policy or previous Privacy Policy statements shall be resolved through negotiation, mediation and arbitration as provided under our Terms of Use.

**23. Entire agreement.** This Privacy Policy hereby incorporates by this reference any additional terms that we post in the App (including, without limitation, our Terms of Use) and, except as otherwise expressly stated herein, this Privacy Policy is the entire agreement between you and us relating to the subject matter herein and supersedes any and all prior or contemporaneous written or oral agreements or understandings between you and us relating to such subject matter.

**24. Contacting us.** If you have any questions about this Privacy Policy, please contact us by email at [ucarpo@outlook.com](mailto:ucarpo@outlook.com).

All materials © 2016 Alec's App LLC unless otherwise noted. All rights reserved.