

## INTRODUCTION

When you use SneakIn, you trust us with your information. We are committed to keeping that trust. That starts with helping you understand our privacy practices.

This policy describes the information we collect, how it is used and shared, and your choices regarding this information. This policy also explains our privacy practices (including what information we collect, when we collect it, and how we use it).

**Last Modified:** 02 January 2019

**Effective Date:** 02 January 2019

## OUR COMMITMENT TO YOU

At SneakIn, your privacy is a top priority. Your privacy is at the centre of the way we design and build the services and products you know and love, so that you can fully trust them and focus on building meaningful connections.

We appreciate that you put your trust in us when you provide us with your information and we do not take this lightly.

**We do not compromise with your privacy.** We design all of our products and services with your privacy in mind. We do our utmost best to make sure that no decision is taken without respect for your privacy.

**We strive to be transparent in the way we process your data.** We have written our Privacy Policy and other related documents in plain language.

**We work hard to keep your information secure.** We constantly update our security practices and constantly increase our efforts to enhance the safety of your information.

## PRIVACY POLICY

Welcome to SneakIn's Privacy Policy.

This Privacy Policy applies beginning 02 January 2019.

EFFECTIVE DATE: 02 January 2019.

## 1. WHO WE ARE

SneakIn Technologies (Pty) LTD is the registered company with a trading name of SneakIn and its website is [www.sneakin.net](http://www.sneakin.net)

## 2. WHERE THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to websites, apps, events and other services operated by SneakIn. For simplicity, we refer to all of these as our “services” in this Privacy Policy.

Some services may require their own unique privacy policy. If a particular service has its own privacy policy, then that policy -- not this Privacy Policy -- applies.

## 3. INFORMATION WE COLLECT

It goes without saying, we can't help you develop meaningful connections without some information about you, such as basic profile details and your interests. We also collect information generated as you use our services, **for example access logs**, as well as information from third parties, like when you access our services through a social media account. If you want additional info, we go into more detail below.

### **Information you give us**

You choose to give us certain information when using our services. This includes:

- When you create an account, **you provide us with at least your login credentials**, as well as some basic details necessary for the service to work such as full names, email address, etc.
- When you complete your profile, you can share with us additional information, such as details on your personality, lifestyle, interests and other details about you, as well as content such as photos and videos. To add certain content, like pictures or videos, you may allow us to access your camera or photo album. By choosing to provide this information, you consent to our processing of that information.
- When you subscribe to a paid service or make a purchase directly from us (rather than through a platform such as iOS or Android), you provide us or our payment service provider with information, such as your debit or credit card number or other financial information.
- When you participate in surveys or focus groups, you give us your insights into our products and services, responses to our questions and testimonials.
- When you choose to participate in our promotions, events or contests, we collect the information that you use to register or enter.
- If you contact our customer care team, we collect the information you give us during the interaction. Sometimes, we monitor or record these interactions for training purposes and to ensure a high quality of service.
- If you ask us to communicate with or otherwise process information of other people, we collect the information about others that you give us in order to complete your request.
- Of course, we also process your chats with other users as well as the content you publish, as part of the operation of the services.

## Information we receive from others

In addition to the information you provide us directly, we receive information about you from others, including:

- **Other Users**  
Other users may provide information about you as they use our services. For instance, we may collect information about you from other users if they contact us about you.
- **Social Media**  
You may be able to use your social media login (such as Facebook Login) to create and log into your SneakIn account. This saves you from having to remember yet another user name and password and allows you to share some information from your social media account with us.
- **Other Partners**  
We may receive information about you from our partners, for instance where SneakIn ads are published on a partner's websites and platforms (in which case they may pass along details on a campaign's success).

## Information collected when you use our services

When you use our services, we collect information about which features you've used, how you've used them and the devices you use to access our services. See below for more details:

- **Usage Information**  
We collect information about your activity on our services, for instance how you use them (e.g., date and time you logged in, features you've been using, searches, clicks and pages which have been shown to you, referring webpage address, advertising that you click on) and how you interact with other users (e.g., users you connect and interact with, time and date of your exchanges, number of messages you send and receive).
- **Device information**  
We collect information from and about the device(s) you use to access our services, including:
  - hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google's AAID and Apple's IDFA, both of which are randomly generated numbers that you can reset by going into your device's settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address);
  - information on your wireless and mobile network connection, like your service provider and signal strength;
  - information on device sensors such as accelerometers, gyroscopes and compasses.
- **Other information with your consent**  
If you give us permission, we can collect your precise geolocation (latitude and longitude) through various means, depending on the service and device you're using, including GPS, Bluetooth or Wi-Fi connections. The collection of your geolocation may occur in the background even when you aren't using the services if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will not collect it.

Similarly, if you consent, we may collect your photos and videos (for instance, if you want to publish a photo, video or streaming on the services).

#### 4. COOKIES AND OTHER SIMILAR DATA COLLECTION TECHNOLOGIES

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services.

**We use cookies to:**

- Understand and save user's preferences for future visits.
- remembering your preferences and settings
- analysing site traffic and trends
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future.

We may allow others to use cookies and similar technologies (e.g., web beacons, pixels) to recognize you and/or your device(s). You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies. If you disable cookies (which you can do through your browser settings), some features will be disabled, and some of our services will not function properly.

Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) have a "Do Not Track" ("DNT") feature that tells a website that a user does not want to have his or her online activity tracked. If a website that responds to a DNT signal receives a DNT signal, the browser can block that website from collecting certain information about the browser's user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many businesses, including SneakIn, do not currently respond to DNT signals.

#### 5. HOW WE USE INFORMATION

The main reason we use your information is to deliver 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.

**To administer your account and provide our services to you**

- Create and manage your account
- Provide you with customer support and respond to your requests
- Complete your transactions
- Communicate with you about our services, including order management and billing

**To help you connect with other users**

- Analyse your profile and that of other users to recommend meaningful connections
- Show users' profiles to one another

### **To serve you relevant offers and ads**

- Administer sweepstakes, contests, discounts or other offers
- Develop, display and track content and advertising tailored to your interests on our services and other sites
- Communicate with you by email, phone, social media or mobile device about products or services that we think may interest you

### **To improve our services and develop new ones**

- Administer focus groups and surveys
- Conduct research and analysis of users' behaviour to improve our services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behaviour)
- Develop new features and services (for example, we may decide to build a new interests-based feature further to requests received from users).

### **To prevent, detect and fight fraud or other illegal or unauthorized activities**

- Address ongoing or alleged misbehaviour on and off-platform
- Perform data analysis to better understand and design countermeasures against these activities
- Retain data related to fraudulent activities to prevent against recurrences

### **To ensure legal compliance**

- Comply with legal requirements
- Assist law enforcement
- Enforce or exercise our rights, for example our Terms

To process your information as described above, we rely on the following legal bases:

- *Provide our service to you:* Most of the time, the reason we process your information is to perform the contract that you have with us.
- *Legitimate interests:* We may use your information where we have legitimate interests to do so. For instance, we analyse users' behaviour on our services to continuously improve our offerings, we suggest offers we think might interest you, and we process information for administrative, fraud detection and other legal purposes.
- *Consent:* From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us in writing.

## **6. HOW WE SHARE INFORMATION**

Because we want to help you make meaningful connections, we share some users' information with service providers, other users and partners who assist us in operating the services, and, in some cases, legal authorities. Read on for more details about how your information is shared with others.

- **With other users**

You share information with other users when you voluntarily disclose information on the service (including your public profile). Please be careful with your information and make sure that the content you share is stuff that you're comfortable being publically viewable since neither you nor we can control what others do with your information once you share it.

If you choose to limit the audience for all or part of your profile or for certain content or information about you, then it will be visible according to your settings.

- **With our service providers and partners**

We use third parties to help us operate and improve our services. These third parties assist us with various tasks, including data hosting and maintenance, analytics, customer care, marketing, advertising, payment processing and security operations.

We may also share information with partners who distribute and assist us in advertising our services.

We follow a strict vetting process prior to engaging any service provider or working with any partner. All of our service providers and partners must agree to strict confidentiality obligations.

- **For corporate transactions**

We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganisation, dissolution, bankruptcy or other change of ownership or control.

- **When required by law**

We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

- **To enforce legal rights**

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

- **With your consent or at your request**

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

We may use and share non-personal information (meaning information that, by itself, does not identify who you are such as device information, general demographics, general behavioural data, geolocation in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above

circumstances. We may also share this information with third parties (notably advertisers) to develop and deliver targeted advertising on our services and on websites or applications of third parties, and to analyse and report on advertising you see.

## 7. YOUR RIGHTS

- You can use account settings to access, rectify or delete information that you provided to us and that's associated with your account directly within the service.
- You can change your settings on your device to either consent or oppose the collection of the corresponding information or the display of the corresponding notifications. Of course, if you do that, certain services may lose full functionality.
- You can delete your account by using the corresponding functionality directly on the service.

We want you to be aware of your privacy rights. Here are a few key points to remember:

- Reviewing your information. Applicable privacy laws may give you the right to review the personal information we keep about you. You can request a copy of your personal information by writing to [info@sneakin.net](mailto:info@sneakin.net)
- Updating your information. If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion or object to its processing, please contact us on [info@sneakin.net](mailto:info@sneakin.net)

For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. If you wish to receive information relating to another user, such as a copy of any messages you received from him or her through our service, the other user will have to contact us to provide their written consent before the information is released.

Also, we may not be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you anymore.

- Uninstall. You can stop all information collection by an app by uninstalling it using the standard uninstall process for your device. If you uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.
- Accountability. You have a right to lodge a complaint with the appropriate data protection authority, where we are established, if you have concerns about how we process your personal information.

## 8. HOW WE PROTECT YOUR INFORMATION

We work hard to protect you from unauthorised access to or alteration, disclosure or destruction of your personal information. Although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure.

We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, and technical security measures.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately, by writing to us on [info@sneakin.net](mailto:info@sneakin.net)

## 9. HOW LONG WE RETAIN YOUR INFORMATION

We keep your personal information only as long as we need it for legitimate business purposes and as permitted by applicable law.

In practice, we delete or anonymise your information upon deletion of your account (following the safety retention window of three months) unless:

1. we must keep it to comply with applicable law (for instance, some “traffic data” is kept for one year to comply with statutory data retention obligations);
2. we must keep it to evidence our compliance with applicable law (for instance, records of consents to our Terms, Privacy Policy and other similar consents are kept for five years);
3. there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
4. the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behaviour or security incidents from opening a new account.

Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

## 10. CHILDREN'S PRIVACY

Our services are restricted to users who are 18 years of age or older. We do not permit users under the age of 18 on our platform and we do not knowingly collect personal information from anyone under the age of 18. If you suspect that a user is under the age of 18, please report to us on [info@sneakin.net](mailto:info@sneakin.net)

## 11. PRIVACY POLICY CHANGES

Because we're always looking for new and innovative ways to help you build meaningful connections, this policy may change over time.

## 12. HOW TO CONTACT US

If you have questions about this Privacy Policy, write to us on [info@sneakin.net](mailto:info@sneakin.net)