Tipi Pty Ltd Privacy Policy

Tipi Pty Ltd. (“Tipi”) knows that you take your privacy seriously. We do, too. We are committed to giving you transparency of our privacy practices and control over your data in connection with Tipi's Services.

This Privacy Policy covers Tipi's treatment of personally identifiable information ("Personal Information") and other data that Tipi gathers when you are accessing Tipi's Services. The Services are not available to individuals who are younger than 16 years old.

What Personal Information Does Tipi Collect?

• Personal Information You Provide to Us: We receive and store any information you enter on our Services or provide to us in any other way. The types of Personal Information collected may include your name, email address, phone number, birthday, location, use information regarding your use of our Services, and browser information.
• We automatically receive your location when you use the Services. We use various technologies to determine location, such as location services of the applicable operating system or browser and sensor data from your device that may, for example, provide information on nearby Wi-Fi access points and cell towers.
• The Personal Information you provide is used for such purposes as allowing you to set up a user account and profile that can be used to interact with other users through the Services, improving the content of the Services, customizing the advertising and content you and your friends see (including Tipi or third-party advertising or content), and communicating with you about specials and new features. Your Services account will be associated with your email and this account will be used for all our Services that you use. Information you provide to one of our Services may be used with other Services you or your friends use. For example, location information we receive in connection with your use of one of our apps may be used to customize the content you and your friends see in another of our apps. We may also draw upon this Personal Information in order to adapt the Services of our community to your needs, to research the effectiveness of our network and Services, and to develop new tools for the community.
• Information Collected Automatically: When you use the Services, Tipi automatically receives and records information on our server logs from your browser or mobile platform, including your location, IP address, browser type, operating information, mobile carrier, device and application IDs, cookie information, and the page you requested. We treat this data as non-Personal Information, except where we are required to do otherwise under applicable law. Unless otherwise stated in this Privacy Policy, Tipi only uses this data in aggregate form. We may provide aggregate
information to our partners about how our users, collectively, use our Services, so that our partners may also understand how often people use their services and our Services.

• Information We Receive from Third Parties: We receive and store information from third parties that interact in some way with the Services or that provide services to us in connection with the Services. For example, if you unlock a Tipi special that is redeemed through a credit card swipe, the credit card processor may tell us information about the redemption such as the time that your card was swiped. In addition, you may choose to use apps that share your Personal Information, activities and/or content with Tipi. Please read the privacy policy of any such app so that you understand its sharing practices.

How is My Information Shared?

Personal Information about our users is an integral part of our business. We neither rent nor sell your Personal Information to anyone, though, as described more fully in this section below (under "Publicly Available Information, the Tipi API, and Apps"), your publicly-available information is available to third parties, and we may provide it to third parties, by license or otherwise. Tipi may share your Personal Information only as described in this Privacy Policy and related documents.

• Other people in your area:
  o Other people in your area can see, for example, your location (as described in more detail below), name, profile photo, hometown, a list of your mutual friends, the places you have visited, your interests, plans you write or comment on, activity feed posts, photos you post, and tips you write.
  o Individuals reading this information may use it or disclose it to other individuals or entities without our control and without your knowledge. We therefore urge you to think carefully about including any specific information you may deem private in comments, plans or tips or other content (location or otherwise) that you create in the Services.

• Businesses, Locations, Events and Brands: One of the key purposes of the Services is to help users learn about businesses, locations, events and brands (for example, a TV show, a TV personality, newspaper or a consumer good that manages a page on the Service) that are relevant to them, and for these entities to provide information about themselves, their locations and events to users, as well as to reward users when they visit their location or event through offers and specials. When you visit to a particular location that is a ‘claimed location’ your visits are shared with that location in order for it to better provide services to you. Additionally,
brands may have access to aggregated and anonymous data, such as de-identified data about places that its followers visit (that is, not tied to individual users).

- Publicly Available Information, the Tipi API, and Apps: When you use the Services, certain information is public, such as your public user profile information, tips, likes, saves, public photos, be cautiously shared with or disclosed to related parties. We may also share or disclose aggregated and anonymous data, such as de-identified check-in data (that is, not tied to individual users), to third parties for analytical or other purposes.

- Agents: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Our agents do not have any right to use Personal Information we share with them beyond what is necessary to assist us, and they provide a comparable level of protection for your Personal Information.

**Determining and Sharing Location**

Determining your location - The Services deal with location, so in order to work, the Services need to know your location. Whenever you open and use/interact with our apps on your mobile device or go to one of our Sites, we use the location information from your mobile device or browser (e.g., latitude and longitude) to tailor the Services experience to your current location (i.e., we’ll show you a list of nearby locations, friends and tips). This information is NOT shared with others outside of Tipi. Also, the Services use your mobile device’s ‘background location’ to provide the Services, including to send you notifications of tips/friends/plans/interesting things etc. near you. If you have ‘background location’ turned on, the Tipi app will, from time to time, tell us about your device’s location even if you are not directly interacting with the application.

Sharing Location with the Tipi app - Your location data is shared with others on the Tipi app to tell the Services you’re at a particular place. The location information shared with a "check in" is the location information of that place.

Sharing Location with the Tipi app - By default, neighborhood sharing is turned on and your location data, at a neighborhood level, is shared with Tipi users and is updated from time to time using your background location.

Your Check-in History - Each of your check-ins using the Services is saved to your "Check-in History," which allows you and your friends to look back at all the locations you have checked in since you created your Services account. You can delete any or all of your check-ins from the check-in details page on our website and in the apps. If for some reason you ever decide to delete your Services account, your entire check-in history will be removed from our database.
Services Features

The Services include several features that may allow you to share your information with others. Please remember that if you choose to provide personal information using certain features of the Services, that information may be available to the wider Services community, or may be published on our Sites, which is subject to indexing by third party search engines.

Sharing with Partners, in connection with business transfers, and for the protection of Tipi and others:

• Our Partners: In addition to the data sharing described above, we enter into relationships with a variety of businesses and work closely with them. In certain situations, these businesses, provide services to you, sell items or provide promotions to you through the Services. In other situations, Tipi provides services, or sells items jointly with these businesses. You can easily recognize when one of these businesses is associated with your transaction, and we will share your Personal Information that is related to such transactions with that business.
• Business Transfers: If Tipi or substantially all of its assets are acquired, or in the unlikely event that Tipi goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party.
• Protection of Tipi and Others: We may release Personal Information when we believe in good faith that release is necessary to comply with the law, including laws outside your country of residence; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of Tipi, our employees, our users, or others. This includes exchanging information with other companies and organizations (including outside of your country of residence) for fraud protection and credit risk reduction.

Email Communications

If you do not want to receive commercial email or other mail from us, please indicate your preference by making a modification on your account settings page or through the 'settings' tab on our website once you're logged into the Services. Please note that if you do not want to receive legal notices from us, such as notices regarding this Privacy Policy, those legal notices will still govern your use of the Services, and you are responsible for reviewing such legal notices for changes. We may receive a confirmation when you open an email from Tipi if your computer supports this type of program. Tipi uses this confirmation to help us make emails more interesting and helpful and improve our service.

What About Cookies and Similar Technologies?
We may work with advertisers or other partners and advertising service providers to serve ads or services to computers, mobile phones or other devices, which may use a cookie, pixel or other similar technology placed by Tipi or the third party (although we would not share any other information that identifies you with an advertiser). This Privacy Policy and Tipi's Cookie Policy covers the use of cookies by Tipi and its service providers and does not cover the use of cookies by any advertisers. For information about how to opt out of receiving behavioral advertisements from our advertising partners, click here or click here. Also, certain versions of the iOS operating system permit you to limit ad tracking in the system settings.

**Is Personal Information About Me Secure?**

Your Tipi account Personal Information is protected by a password for your privacy and security. You need to prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately, and limiting access to your computer and browser by signing off after you have finished accessing your account.

Tipi endeavors to safeguard user information to ensure that user account information is kept private. However, Tipi cannot guarantee the security of user account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

The Services may contain links to other sites. Tipi is not responsible for the privacy policies and/or practices on other sites. When linking to another site, you should read the privacy policy stated on that site. This Privacy Policy only governs information collected on the Services.

**International Users**

If you are located outside of Australia, please note that this app is hosted on our computer servers in Australia. Therefore, your information may be processed and stored in Australia. As a result, Australian federal and state governments, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your information through laws applicable in Australia. Your use of the Sites or the Services or your submission of any Personal Information to us will constitute your consent to the transfer of your Personal Information outside of your home country, including Australia, which may provide for different data protection rules than in your country.

Tipi complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Tipi has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data
integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Tipi's certification, please visit http://www.export.gov/safeharbor/.

**General Data Protection Regulation**

If you are a citizen of the European Economic Area (EEA) then information collected by Tipi may be required to comply with the European Data Protection Regulation (GDPR). Many obligations contained in the GDPR have equivalent obligations under the Australian Privacy Principles.

If you have any queries in relation to how your data is handled, please contact our data protection officer at privacy@GetTipi.com.

If you an individual in the EEA, we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases will vary depending on the service provided. This means we collect and use your information only where:

- We need it to provide services to you, including the core features of Tipi;
- There is a legitimate interest in collection of your data which is not outweighed by your interests in protection of your data;
- You have given us consent; or
- Your data is required to comply with a legal obligation.

If you object to Tipi's use of your personal data it may mean you are no longer able to use the Tipi app.

EEA residents have the following rights that they may exercise by notifying the Tipi data protection officer:

- **Right to erasure** – You may have the right to erasure of your personal information under Article 17 of the GDPR. If you notify Tipi of a request under Article 17 then we will respond within one month confirming if your data has been erased. We may not comply with such a request if the right to erasure does not apply, for example if there is a legal obligation to retain the data.

- **Right to data portability** – You may be entitled to request a copy of the personal data held by Tipi. If you make such a request, we will deliver the data to you in a structured, commonly used and machine-readable format. Once you have a copy of this data Tipi will not place any restriction on your use of that data. You may also request that Tipi transfers your data
directly to another party, if it is technically feasible to do so.

- Right to object – You may ask Tipi to cease processing your personal data. You have the absolute right to object to the processing of personal data if it is for direct marketing purposes. There are other basis upon which you can object to your data being processed however there may also be circumstances where Tipi will continue to process your personal data, such as if it relates to legal action.

By using Tipi you consent to the transfer of your personal data to Australia where the app and relevant computer services are hosted. Data held in Australia is protected by the Australian Privacy Principles. If your data is then transferred to another country then Tipi will ensure that any such transfer is not in breach of the GDPR and appropriate protections are in place.

Where Tipi engages an external data processor we take steps to ensure that the data processor implements appropriate technical and organisational measures to ensure compliance with the GDPR and protect your rights in relation to your data.

You may withdraw your consent to the use of your data at any time. You can do so by contacting our data protection officer.

**What Personal Information Can I Access?**

Tipi allows you to access the following information about you for the purpose of viewing, and in certain situations, updating that information and ensuring that it is accurate and complete. You can access this information on the Services by visiting the user settings page (except usage information, which can be accessed in the "History" tab). This list will change as our Service changes.

- Other User profile information (for example, home city, photo)
- Usage information (for example, check-in history)

If you have questions about the Personal Information we have collected from you, you can email privacy@GetTipi.com.

**How Do I Delete My Tipi App?**

Should you ever decide to delete your app, you may do so by holding your finger on the Tipi icon on your relevant app page, and then click the cross in the top left of the icon. If you terminate your account, your profile, including your check-in history, your User Submissions (as defined in Tipi's Terms of Service) and any promotional offers you received, will be removed from the site and deleted from Tipi's servers. Because of the way we maintain Tipi, such deletion may not be immediate, and residual copies of your profile information or posts may remain
on backup media for up to ninety (90) days.

**How Is Information Removed From My Account?**

Even after you remove information from your account or profile, copies of that information may remain viewable elsewhere, to the extent it has been shared with others, it was otherwise distributed pursuant to your privacy settings, or it was copied or stored by other users. Removed and deleted information may remain on backup media for up to ninety (90) days prior to being deleted from our servers.

**Will There Be Changes To This Privacy Policy?**

Tipi may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make material changes in the way we use Personal Information, we will notify you by posting an announcement on our Services or sending you an email. Users are bound by any changes to the Privacy Policy when they use the Services after such changes have been first posted.

**What If I Have Questions Or Concerns?**

If you have any questions or concerns regarding privacy using the Service, please send a detailed message to: privacy@GetTipi.com. We will make every effort to resolve your concerns.