# PRIVACY POLICY

Last Updated on June 16, 2020

#### 1. Introduction

Red e App, Inc. (formerly Red e Productions LLC, "Red e App," "we," or "us") provides this "Privacy Policy" to inform users of our policies and procedures regarding the collection, use and disclosure of information that we receive when users access the Red e App website (http://www.redeapp.com) ("Site") or the mobile application (collectively, "Red e App Services").

Red e App is committed to protecting your privacy and understands the importance of safeguarding information we collect. Our Privacy Policy explains:

- What information we collect or that you may provide when you download, install, register with, access, or use the Red e App Services.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information. What choices you have as a user of Red e App Services.

This policy only applies to information we collect through the Red e App Services and in email, text, and other electronic communications sent through or in connection with the Red e App Services. If you use our Passport contact tracing services, please see our privacy policy relating to that service available <a href="here">here</a>.

This Privacy Policy does not apply to information that:

- We collect offline: or
- You provide to or is collected by any third party (see Third Party Information Collection).

Further, if you are using Red e App Services in a workplace or on a device or account issued to you by your employer, or another third party, we may share information with such parties pursuant to our agreement with them as described in How We Use Your Information section below. It is important to understand that these third parties likely maintain their own policies that will detail how they handle issues such as access, information storage and modifications, and retention of communications and content which may arise out of your use of Red e App Services.

## 2. Acknowledgment & Acceptance of Terms

We encourage you to read this entire Privacy Policy and use it to help you make informed

decisions relating to your use of Red e App Services. By accessing Red e App Services, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see Changes to this Privacy Policy).

#### 3. Information We Collect and Receive

- a. **Information You Provide.** When you download, register with, or use the Red e App Services, we may ask you to provide information. Such information may include:
  - **Profile or account information**, including, your name, company or organization name and email address.
  - Communications information including information you provide to us by filling in forms in the Red e App Services. This includes information you provide when you register to use the Red e App Services, post materials, and request further services. We may also ask you for information when you report a problem with the Red e App Services. We also collect records of your correspondence (including email addresses and phone numbers), if you contact us.
  - Transaction information including details of transactions you carry out through your use of the Red e App Services and your search queries.
  - Health Information. The Red e App Services allow you to choose what
    information it communicates to others through the use of our services. In some
    cases, you may use the Red e App Services to communicate health-related
    information. If you use our Passport Service Offering, we may request that you
    provide health-related information. If you use our Passport Service Offering,
    please see our Passport Privacy Policy available <a href="here">here</a>.
  - Service-related information including information you communicate to other
    users through your use of the Red e App Services. The Red e App Services are
    designed to provide employers and other third-parties digital connections to
    their employees and teams. To make that possible, we collect, store, transmit,
    process, and display your content including files, messages, comments, and
    other materials (User Content) as well as related information which may include
    your profile information to make it easier to communicate with others within
    your company, on your teams, and in your groups.
  - **Unique identifiers** include an online identifier, IP address, mobile device identifiers, username.
- b. **Automatic Information Collection and Tracking.** When you access or use Red e App Services, we may use technology to automatically collect information about you including:
  - Usage Details. We collect usage data about you whenever you access and use the Red e App Services including traffic data, location data, and other communication data and the resources that you access and use on or through the Red e App Services. Additionally, our web servers keep log files that record

- data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses.
- **Device Information.** We collect information about your mobile device and internet connection, including the devices unique device identifier, IP address, operating system, browser type, mobile network information, and the devices' telephone number.
- Information Obtained by Tracking Technologies or Cookies. We may use various technologies to collect information about you.

For more information see the Information Collection and Tracking Technologies including Cookies below.

c. Information We Receive from Third Parties or Publicly Available Sources. We may receive information about you from third parties including, for example, our business partners, subcontractors, analytics providers, and service providers. If your employer or other third-party has purchased our Services, they may provide us with information about you so that we can setup and maintain your account. We may receive information from your employer or other third-party organization that we need to set up your account.

# 4. Information Collection and Tracking Technologies including Cookies.

The technologies we use for automatic information collection may include:

- a. **Cookies (or mobile cookies).** Cookies are small data files stored on your hard drive or in device memory that help us improve Red e App Services, customize your experience and preferences, and understand which areas and features of Red e App Services are most popular and account activity.
- b. **Web Beacons.** Certain pages of our Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

We use Google Analytics to provide certain analytics services for us. More information about Google Analytics can be found in the <u>Google Analytics Terms of Service</u> and the <u>Google Analytics Privacy Policy</u>.

We do not currently respond to or honor "do not track" (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

For more information on managing our use of these technologies, see Your Rights and Choices.

## 5. Third Party Information Collection

We do not allow third party information collection within our mobile application. However, when you browse our Site, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

Some partners on our Site may use non-cookie technologies on which browser settings that block cookies might have no effect. Your browser may not permit you to block such technologies. For this reason, keep in mind that you can block the collection and use of information related to you by advertising companies for the purpose of serving interest-based advertising by visiting the following platforms of self-regulatory programs of which those companies are members:

- The NAI's opt-out platform: <u>www.networkadvertising.org/choices</u>
- The DAA's opt-out platform: <a href="https://www.aboutads.info/choices">www.aboutads.info/choices</a>

#### 6. How We Use Your Information

Generally, we use the information we collect from you in connection with providing Red e App Services to users and their organizations. For example, below are specific ways we use this information:

- Provide access to the Red e App Services;
- Maintain, support, operate, personalize and improve Red e App Services:
- Give you notices about your account, including expiration and renewal notices.
- Investigate foul play and prevent fraud or abuse;
- Communicate with users and their organization regarding the services, features, etc.:
- Provide users with technical updates and downloads, security alerts and support and administrative messages;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us and/or your organization;

- Fulfill any other purpose for which you provide it; and
- Customer support and feedback.

The usage information we collect helps us improve our Red e App Services and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Red e App Services.

If you are a network administrator or prospective customer, we may also use your information to contact about goods and services that may be of interest to you. If you do not want us to use your information in this way, follow the instructions to opt-out of receiving promotional emails in Your Rights and Choices below.

# 7. Sharing and Disclosure of Information

Except as described below, otherwise described at the time we collect your information, or with a user's consent, Red e App will not disclose any personal information a user provides with anyone except to provide users with access to Red e App Services.

If you are using Red e App in your workplace or on an organization issued device, your organization will likely have its own policies in place regarding your communications and use of Red e App. In addition to reviewing our policies, you should also check with your organization or network administrator to see what policies they have in place.

Red e App may disclose the personal information that we collect:

- a. To your organization & network administrators. If the email address under which you have registered your account belongs to or is controlled by an organization we may disclose that email address, any information associated with that email address and or account (including Service-related information), and associated network names to that organization in order to assist your organization with its associated network accounts and user activity.
- b. To our subsidiaries and affiliates.
- c. To our service providers, contractors and other third parties we employ to administer and or provide aspects of Red e App Services for us or on our behalf. These third parties may have access to personal information, you have provided, only to perform these tasks on our behalf and are required not to disclose or use such information for any other purpose.
- d. To comply with any court order, law, or legal process. Red e App may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe reasonably necessary or appropriate to respond to claims and legal process, to protect the safety of

the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, unauthorized or harmful.

- e. To a buyer or other successor. Red e App may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business deal such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will require the recipient to honor this Privacy Policy. You acknowledge that such transfers may occur and that any acquirer or successor of Red e App or its assets may continue to use your information as set forth in this Privacy Policy. You will be notified via email and/or a prominent notice on our Site or Red e App Services of any change in ownership or resulting change in uses of your information, as well as any choices you may have regarding your information.
- f. To fulfill the purpose for which you provide it.
- g. For any purpose disclosed by us when you provide the information.
- h. To enforce our rights arising from any contracts entered into between you and us, or between us and your organization.
- i. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Red e App, our customers or others.

Red e App may disclose aggregated information about our users and information that does not identify any individual or device without restriction.

## 8. Your Rights and Choices

When you use Red e App Services, you have control over a number of things with respect to your own privacy. Red e App network administrators will have additional choices that impact the privacy of users that may not be accessible to all users, because Red e App provides network administrators with the maximum ability to control the users from their organization.

- a. **Promotional Emails.** You may opt-out of receiving future promotional emails from us by adjusting your account preferences. If we have sent you a promotional email, you may click "unsubscribe" link at the bottom of the relevant email. You may also send an email stating your request to privacy@redeapp.com. This opt-out does not apply to information provided by Red e App as a result of a product purchase or other non-marketing related transaction.
- b. Cookies and other Tracking Technologies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. If you do not want Google Analytics to be used in your browser, Google Analytics provides an opt-out tool which can be found <a href="here">here</a>. For additional information about opting out of third-party tracking, see Third Party Information Collection.
- c. Choices for Users. As an end user, you may:
  - Account Information. Update or correct your account information and other

- settings at any time by visiting the account settings tab within Red e App Services; and
- **User Content.** You can delete User Content that is stored on your device. You should contact your employer or organization to enquire about additional rights that you may have with respect to User Content.
- d. **Choices for Organizations & Administrators.** If you act on behalf of an organization as an administrator, you may:
  - Network administrators have the ability to manage and change most of the settings on behalf of the user's organization. Administrators can also deactivate user accounts for their organization. Only an authorized representative of an organization may deactivate or delete networks, groups or accounts.
  - Network administrators can export message content from users that are in their network. Message history for direct messages between users can be included in this.

#### e. Your California Privacy Rights.

If you are a California resident, California law may provide you with additional rights regarding use of your personal information. Red e App acts as a service provider to its customers and their users. If you are user of our Red e App Services and you believe you may have additional rights under California law, you should contact your employer or other third-party organization to exercise these rights.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. At this time, we do not engage in this type of disclosure.

#### f. Nevada Privacy Rights

Nevada residents have the right to opt-out of the sale of certain "covered information" collected by operators of websites or online services. We currently do not sell covered information, as "sale" is defined by Nevada law, and we do not have plans to sell this information.

# 9. Security

We follow generally accepted security measures standards to protect information that is submitted to us, both during transmission and once we receive it, which includes encrypted storage practices, firewalls and user password protection. The security of user information extends to internal reviews of our information collection, processing, and storage processes. Each of our employees are aware of our security policies, and your information is only available to those employees who need it to perform their jobs.

To learn more about our security practices and policies, please see our **Security Policy**.

#### 10. International Transfer

Your information may be transferred to, and maintained on, servers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to Red e App, please be advised that we transfer personal information to the United States and process it there. We adhere to the EU-U.S. and Swiss-U.S. Privacy Shield Framework. Our Privacy Shield Notice is available <a href="https://example.com/here">here</a>.

If your company or organization has agreements in place, with Red e App that apply to international relations and transfer and or location of specific data, those agreements shall govern in case of conflict with this Privacy Policy.

#### 11. Children

Red E App Services are not directed to children under 13, as such; we do not knowingly collect personally identifiable information from children under 13. If we learn that any user of Red e App Services is indeed under the age of 13, we will take appropriate steps to remove that user's information from our databases and restrict that individual's access.

# 12. Changes to this Privacy Policy

We will post any changes we may make to our Privacy Policy on this page. If the changes materially alter how we use or treat your information we will notify you by email to the primary email address specified in your account (if you have an account with us) and/or through a notice on the website home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring that we have an up-to-date email address for you and for periodically visiting our website and this page to check for any changes.

#### 13. Questions or Comments?

If you have questions regarding our Privacy Policy, please contact us at privacy@redeapp.com or send your comments by mail to:

Red e App, Inc 900 E Main Street Louisville, KY 40206