

CircleRanks Mobile App Privacy Policy

Introduction

CircleRanks LLC (“Company” or “We”) respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you purchase, download, install, register with, access, or use the CircleRanks application (the “App”); and
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in this App or in connection with this App. This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App; or
- You provide to or is collected by any third party.

Our websites and apps, and these other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This policy may change from time to time. Your continued use of this App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

Children Under the Age of 16

The App is not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the contact information found at the bottom of this policy. California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information.

Information We Collect and How We Collect It

We collect information from and about users of our App:

- Directly from you when you provide it to us; and
- Automatically when you use the App.

Information You Provide to Us

When you download, register with, or use this App, we may ask you provide information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline (“personal information”); and/or
- That is about you but individually does not identify you.

This information includes:

- Information that you provide by filling in forms in the App. This includes information provided at the time of registering to use the App. We may also ask you for information when you report a problem with the App;
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us; and
- Your search queries on the App.

Information We Collect Through Automatic Data Collection Technologies

When you download, access, and use the App, it may use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, logs, and other communication data and the resources that you access and use on or through the App; and
- **Device Information.** We may collect information about your mobile device and internet connection, including the device’s unique device identifier, IP address, operating system, browser type, mobile network information, and the device’s telephone number.

If you do not want us to collect this information do not download the App or delete it from your device. We also may use these technologies to collect information about your activities over time and across third-party websites, apps, or other online services (behavioral tracking).

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.
- **Web Beacons.** Pages of the App may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers;
- Analytics companies;
- Your mobile device manufacturer; and/or
- Your mobile service provider.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the App and its contents, and any other information, products, or services that you request from us;
- Fulfill any other purpose for which you provide it;
- Give you notices about your account;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection; and/or
- Notify you when App updates are available, and of changes to any services we offer or provide through it.

The usage information we collect helps us to improve our App 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; and
- Recognize you when you use the App.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, you can opt-out by sending a request to the contact information found at the bottom of this policy. We may use the information we collect to display advertisements to our advertisers' target audiences. If you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates;
- To contractors, service providers, and other third parties we use to support our business;

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about our App users is among the assets transferred;
- To third parties to market their products or services to you if you have not opted out of these disclosures;
- For any other purpose disclosed by us when you provide the information;
- With your consent;
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce our rights arising from any contracts entered into between you and us, including the App End User Agreement, and for billing and collection; and/or
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Promotion by the Company.** If you do not want us to use your contact information to promote our own or third parties’ products or services, you can opt-out by sending a request to the contact information found at the bottom of this policy.
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers’ target-audience preferences, you can opt-out by sending a request to the contact information found at the bottom of this policy.
- **Disclosure of Your Information for Third-Party Advertising and Marketing.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt-out by sending a request to the contact information found at the bottom of this policy.

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website. Residents in certain states, such as California, may have additional personal information rights and choices.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding

our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us using the contact information found at the bottom of this policy.

Data Security

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the App like message boards. The information you share in public areas may be viewed by any user of the App.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, or to register a complaint or concern, please contact us at: admin@circleranks.com or P.O. Box 393, 18 Locust Ave., New Canaan, CT 06840-4762.