

Privacy Policy

Effective: January 02, 2017

Introduction

“gLockr” is a trademark of Seventeen91 Inc.

The Company respects your privacy and values the trust you place in it. Set out below is the Company’s ‘Privacy Policy’ which details the manner in which information relating to you is collected, used and disclosed.

If you do not agree with the terms and conditions of our Privacy Policy, including in relation to the manner of collection or use of your information, please do not use or access the app, website or any other medium provided by gLockr as a part of its suite.

Our privacy policy will help you understand what information we collect, how do we use it, and why it is essential for providing you with better services. When we talk about “gLockr,” “we,” “our,” or “us” in this policy, we are referring to Seventeen91 Inc., the company which provides the Services. When we talk about the “Services” in this policy, we are referring to our online platform, the mobile app and any other certified medium as we extend our portfolio of medium of access.

Information we collect and receive

1. Customer Data

Content and information submitted by users to the Services is referred to in this policy as “Customer Data.” As further explained below, Customer Data is controlled by the customer or other third party that created the account (the “Customer”). Where gLockr collects or processes Customer Data, it does so on behalf of the Customer.

Here are some examples of Customer Data (but keep in mind they are only examples and there may be others): devices owned, messages , pictures, edits to devices related information submitted to gLockr or deleted messages, and other types of files. A user may also choose to enter information into their profile, such as name, email, photo and a phone number.

If you join gLockr and create a user account, you are a “user,” as further described in the User Terms of Service.

2. Other information

gLockr may also collect and receive the following information:

- **Account creation information:** Users provide information such as an email address, mobile number and password to create an account.
- **Billing and other information:** For Customers who purchase our Services, our corporate affiliates and our third party payment processors may collect and store billing address and credit card

information on our behalf or we may do this ourselves.

- **Services usage information:** This is information about how you are accessing and using the Services, which may include administrative and support communications with us and information about the people, features, content, and links you interact with, and what third party integrations you use (if any).
- **Contact information:** With your permission, any contact information you choose to import is collected (such as an address book from a device) when using the Services.
- **Log data:** When you use the Services our servers automatically record information, including information that your browser sends whenever you visit a website or your mobile app sends when you are using it. This log data may include your Internet Protocol address, the address of the web page you visited before using the Services, your browser type and settings, the date and time of your use of the Services, information about your browser configuration and plug-ins, language preferences, and cookie data.
- **Device information:** We may collect information about the device you are using the Services on, including what type of device it is, what operating system you are using, device settings, application IDs, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings.
- **Geo-location information:** Precise GPS location from mobile devices is collected only with your permission. WiFi and IP addresses received from your browser or device may be used to determine approximate location.
- **Services integrations:** If, when using the Services, you integrate with a third party service or use our integrated services, we may collect some information. The third party provider of the integration may share certain information about your account with gLockr. However, we do not receive or store your passwords for any of these third party services.
- **Third party data:** gLockr may also receive information from affiliates, our partners, or others that we use to make our own information better or more useful. This might be aggregate level information, such as which IP addresses go with which pin codes, or it might be more specific information, such as about how well an online marketing or email campaign performed.

Our Cookie Policy

gLockr may use cookies and other technologies like single-pixel gifs and web beacons, to record log data. We use both session-based and persistent cookies.

Cookies are small text files sent by us to your computer and from your computer or mobile device to us each time you visit our website or use our application. They are unique to your account or your browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your

browser delete them or until they expire.

Some cookies are associated with your account and personal information in order to remember that you are logged in. Other cookies are not tied to your account but are unique and allow us to carry out site analytics and customization, among other similar things.

gLockr sets and accesses our own cookies on the domains operated by gLockr and its affiliates. In addition, we use third parties like Google Analytics for website analytics and Google App analytics for Mobile app analytics . You may opt-out of third party cookies from Google Analytics on its website - but it will impact the nature of services provided by gLockr. We do not currently recognize or respond to browser-initiated Do Not Track signals as there is no consistent industry standard for compliance.

How we use your information

We use your information to provide and improve the Services.

1. Customer Data

gLockr may access and use Customer Data as reasonably necessary and in accordance with Customer's instructions to (a) provide, maintain and improve the Services; (b) to prevent or address service, security, technical issues or at a Customer's request in connection with customer support matters; (c) as required by law or as permitted by the Data Request Policy and (d) as set forth in our agreement with the Customer or as expressly permitted in writing by the Customer. Additional information about gLockr's confidentiality and security practices with respect to Customer Data is available at our Security Practices page.

2. Other information

We use other kinds of information in providing the Services. Specifically:

- **To understand and improve our Services.** We carry out research and analyze trends to better understand how users are using the Services and improve them.
- **To communicate with you by:**
 - **Responding to your requests.** If you contact us with a problem or question, we will use your information to respond.
 - **Sending emails and gLockr messages.** We may send you Service and administrative emails and messages. We may also contact you to inform you about changes in our Services, our Service offerings, and important Service related notices, such as security and fraud notices. These emails and messages are considered part of the Services and you may not opt-out of them. In addition, we sometimes send emails about new product features or other news about gLockr. You can opt out of these at any time.
- **Billing and account management.** We use account data to administer accounts and keep track of billing and payments.
- **Communicating with you and marketing.** We often need to contact you for invoicing, account management and similar reasons. We may also use your contact information for our own marketing or advertising purposes. You can opt out of these at any time.

- **Investigating and preventing bad stuff from happening.** We work hard to keep the Services secure and to prevent abuse and fraud.

This policy is not intended to place any limits on what we do with data that is aggregated and/or de-identified so it is no longer associated with an identifiable user or Customer of the Services.

Your choices

1. Customer Data

A Customer has many choices and control over Customer Data. For example, enable or disable third party integrations, manage permissions, transfer data to another account etc. Since these choices and instructions may result in the access, use, disclosure, modification or deletion of certain or all Customer Data, please review the Help Center pages for more information about these choices and instructions.

2. Other information

If you have any questions about your information, our use of this information, or your rights when it comes to any of the foregoing, contact us at feedback@gLockr.com.

Other Choices

In addition, the browser you use may provide you with the ability to control cookies or other types of local data storage. Your mobile device may provide you with choices around how and whether location or other data is collected and shared. gLockr does not control these choices, or default settings, which are offered by makers of your browser or mobile device operating system.

Sharing and Disclosure

There are times when information described in this privacy policy may be shared by gLockr. This section discusses only how gLockr may share such information. Customers determine their own policies for the sharing and disclosure of Customer Data. gLockr does not control how Customers or other third parties choose to share or disclose Customer Data.

1. Customer Data

gLockr may share Customer Data in accordance with our agreement with the Customer and the Customer's instructions, including:

- **With third party service providers and agents.** We may engage third party companies or individuals to process Customer Data.
- **With affiliates.** We may engage affiliates in our corporate group to process Customer Data.
- **With third party integrations.** gLockr may, acting on our Customer's behalf, share Customer Data with the provider of an integration added by Customer. gLockr is not responsible for how the provider of an integration may collect, use, and share Customer Data.

2. Other information

gLockr may share other information as follows:

- **About you with the Business Customer.** There may be times when you contact gLockr to help resolve an issue specific to a service or item owned. In order to help resolve the issue and given our relationship with our Business Customer, we may share your concern with them.
- **With third party service providers and agents.** We may engage third party companies or individuals, such as third party payment processors, service providers, to process information and provide services on our behalf.
- **With affiliates.** We may engage affiliates in our corporate group to process other information.
- **With Brands.** We may engage with brands to share and process anonymised information.

3. Other types of disclosure

gLockr may share or disclose Customer Data and other information as follows:

- **During changes to our business structure.** If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of gLockr's assets, financing, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence).
- **To comply with laws.** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety.** To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.

We may disclose or use aggregate or de-identified information for any purpose. For example, we may share aggregated or de-identified information with our partners or others for business or research purposes like telling a prospective gLockr Business Customer the average number of messages sent within a gLockr team in a day or partnering with research firm, academics or brands to explore and bring interesting information and offers related to your device ecosystem.

Security

gLockr takes security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology.

Children's information

Our Services are not directed to children under 13. If you learn that a child under 13 has provided us with personal information without consent, please

contact us.

Changes to this Privacy Policy

We may change this policy from time to time, and if we do we will post any changes on this page. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

EU-U.S. Privacy Shield and U.S.-Swiss Safe Harbor

gLockr has self-certified to the EU-U.S. Privacy Shield with respect to Customer Data. For more information, see our Privacy Shield Notice. gLockr complies with 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 data from Switzerland. We may process some personal data from individuals or companies in Switzerland via other compliance mechanisms, including data processing agreements based on the EU Standard Contractual Clauses. To learn more about the U.S.-Swiss Safe Harbor program, and to view our certification, refer to <http://2016.export.gov/safeharbor/>.

Contacting gLockr

Please also feel free to contact us if you have any questions about gLockr's Privacy Policy or practices. You may contact us at feedback@gLockr.com or at our mailing address below:

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