

**Privacy Policy**  
*Last updated: March 03 2020*

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, Consumer Ledger Inc. (“**Consumer Ledger**” “**we**”, “**our**” or “**us**”) use Personal Information (defined below) that we collect, receive and store pertaining to you (“**User**”, “**you**”). For example, it applies when we collect your Personal Information in connection with the following use cases:

- (i) When you make use of, or interact with, the Consumer Ledger mobile software application, and any other mobile software application, that we license (each individually, and collectively, the “**App**”), such as:
  - a. When you download our App, sign up for an account and/or login
  - b. When you make use of our services
  - c. When you contact us (e.g. customer support, help, submit a request)
- (ii) When you browse or visit our website [www.consumer-ledger.com/](http://www.consumer-ledger.com/) (“**Website**”)
- (iii) When you make use of, or interact with, our Website
  - a. When you subscribe to our newsletter (e.g. “Get Notified”/ “Join”/ “Waiting list”)
- (iv) When you attend a marketing event and provide Personal Information

The Website and the App are individually and collectively referred to herein as the “**Services**”.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data** or **Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals

**Terms of Use and EULA.** This Privacy Policy forms part of our Terms of Use available on our Website (“**Terms**”) and the App’s End User License Agreement which can be viewed from within the App and which you accepted prior to downloading, installing and/or using the App for the first time (“**EULA**”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms or the EULA.

**Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement

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**1. INTRODUCTION**

We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your personal information is collected and used in connection with our Website. “**Personal Information**” means any information relating to an identified or identifiable natural person, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information. You are not legally obligated to provide us Personal Information, and you hereby confirm that providing us Personal Information is at your own free will. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the Website.

**2. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

Specific personal data we collect	Why is the Information collected and for what purposes?	Legal basis (GDPR only, if applicable)	Third parties with whom we share your personal data	Retention period	Consequences of not providing the personal data
<i>When you make use of, or interact with, the Consumer Ledger mobile software application, and any other mobile software application, that we license</i>					
<i>When you download our App, sign up for an account and/or login</i>					

<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Log-in with Facebook and/or Instagram accounts</li> <li>User profile</li> </ul>	<ul style="list-style-type: none"> <li>To download the App</li> <li>To allow you to create your user account</li> <li>To allow you make use of our App</li> <li>To improve the App</li> <li></li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. to provide the services)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Google Play – Apps store</li> <li>Google Cloud - Cloud infrastructure</li> <li>App Store – Apps store</li> <li>Facebook SDK – User login and analytics</li> <li>AWS – Cloud infrastructure</li> <li>Firebase – App infrastructure</li> </ul>	<p>We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot download and use our App</p> <p>Cannot allow you to create your user account</p> <p>Cannot make use of the App</p> <p>Cannot improve the services of our App</p>
Location data (Geolocation)	We use your location when you are using the app, when you ask for a recommendation for a place around you, or when you send a request to add/update a place review.	Consent	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Google Cloud - Cloud infrastructure</li> <li>Apple – App services (e.g. maps and location)</li> </ul>	We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws.	Cannot provide the location would prevent us from using it for such purposes. In particular, we'll not be able to show you places around you, and we'll not be able to insert a place in your location, when you request so.
<b>When you make use of our services</b>					
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>User profile and user name</li> <li>Content, photos, reviews, comments and/or recommendations</li> <li>Any other information that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To give you recommendations</li> <li>To allow you to upload your reviews</li> <li>To analyze and learn from your recommendations (reviews and photos)</li> <li>To perform our services and give you stats to businesses</li> <li>To improve the App</li> <li>To analyze and optimize your use of our App</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party.</p> <p>Legitimate interest (e.g. to allow you to make use of the services)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Google Cloud - Cloud infrastructure</li> <li>AWS – Cloud infrastructure</li> <li>Firebase – App infrastructure</li> <li>Apple – App services (e.g. maps and location)</li> </ul>	We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws	<p>Cannot give you recommendations</p> <p>Cannot allow you to upload your reviews</p> <p>Cannot analyze and learn from your recommendations</p> <p>Cannot perform our services and give stats to businesses</p> <p>Cannot improve the services of our App</p> <p>Cannot optimize the use of the App</p>
<ul style="list-style-type: none"> <li>Location data (Geolocation)</li> </ul>	We use your location when you are using the app, when you ask for a recommendation for a place around you, or when you send a request to add/update a place review.	Consent	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Google Cloud - Cloud infrastructure</li> <li>Apple – App services (e.g. maps and location)</li> </ul>	We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws.	Cannot provide the location would prevent us from using it for such purposes. In particular, we'll not be able to show you places around you, and we'll not be able to insert a place in your location, when you request so.
<b>When you contact us (e.g. customer support, help, submit a request)</b>					
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Message</li> <li>Any other information that you decided to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>To answer questions</li> <li>To provide support</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to answer your questions)</p>	<p>3<sup>rd</sup> party platforms such as:</p> <ul style="list-style-type: none"> <li>Hover – Domains and email</li> <li>Google - Email</li> <li>Apple – Cloud</li> </ul>	We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws.	<p>Cannot respond to questions</p> <p>Cannot provide support</p>
<b>When you browse or visit our Website</b>					
<p>Cookies, analytic tools and log files</p> <p>For more information, please read our cookies policy <a href="#">[LINK]</a></p>	Marketing, analytics, analysis, market research, to improve our website	<p>Consent</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3<sup>rd</sup> party platforms, such as:</p> <ul style="list-style-type: none"> <li>Webflow – Website developpe &amp; hosting</li> <li>Hover – Domains</li> <li>Google – Analytics</li> <li>Facebook Pixel – Analytics</li> <li>Mixpanel - Analytics</li> </ul>	For more information, please read our cookies policy <a href="#">[LINK]</a>	<p>Cannot collect and store the information</p> <p>Cannot use or access some parts of the Website</p>
<b>When you make use of, or interact with, our Website</b>					

When you subscribe to our newsletter (e.g. “Get Notified”/ “Join”/“Waiting list”)					
<ul style="list-style-type: none"><li>Email address</li></ul>	<ul style="list-style-type: none"><li>To add you to our mailing list and keep you updated of new services, features and functionalities as well as updates about Consumer Ledger</li></ul>	Consent  Legitimate interest (e.g. send you more information about Consumer Ledger)	3 <sup>rd</sup> party platforms, such as: <ul style="list-style-type: none"><li>Webflow – user forms</li></ul>	We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws.	Cannot add you to our mailing list and keep you updated of new services, features and functionalities as well as updates about Consumer Ledger
When you attend a marketing event and provide Personal Information					
<ul style="list-style-type: none"><li>Full name</li><li>Email address</li><li>Phone number</li><li>Company name</li><li>Any other information that you decide to provide/supply us</li></ul>	<ul style="list-style-type: none"><li>To establish a business connection</li></ul>	Consent  Legitimate interest (e.g. send you more information about Consumer Ledger)	3 <sup>rd</sup> party platforms, such as: <ul style="list-style-type: none"><li>Webflow – User forms</li><li>Apple – Cloud</li><li>Dropbox – Cloud</li><li>Microsoft - Cloud</li></ul>	We will store your Personal Information until we no longer need the information and proactively delete it if you send a valid deletion request. Please note that we will retain it for a longer or shorter period in accordance with data retention laws.	Cannot establish a business connection

Finally, please note that some of the abovementioned personal data will be used for fraud detection and prevention, and for security purposes. The abovementioned personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your personal data. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

3. HOW WE PROTECT AND STORE YOUR INFORMATION

- 3.1 Security. We have implemented appropriate technical, organizational and security measures designed to protect your personal data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 3.2 Retention of your personal data. In addition to the retention periods mentioned above, in some circumstances we may store your personal data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually. Regarding retention of cookies, you can read more in our cookie policy <https://www.consumer-ledger.com/cookies>.

4. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to the recipients described above, we may share your personal data as follows:

- 4.1 To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 4.2 If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 4.3 In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events; and/or
- 4.4 Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

If you want to receive the list of the current recipients of your personal data, please make your request by contacting us to [privacy@consumer-ledger.com](mailto:privacy@consumer-ledger.com).

5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION

- 5.1 Storage: We storage the Personal Data in Google Cloud hosted in the US
- 5.2 External transfers:
- Where we transfer your personal data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your personal data.
  - Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States.

6. YOUR PRIVACY RIGHTS. HOW TO DELETE YOUR ACCOUNT

- a. Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
  - You have a right to access personal data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
  - You have the right to request that we rectify any personal data we hold that is inaccurate or misleading;
  - You have the right to request the erasure/deletion of your personal data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
  - You have the right to object, to or to request restriction, of the processing;
  - You have the right to data portability. This means that you may have the right to receive your personal data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
  - You have the right to object to profiling;
  - You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
  - You also have a right to request certain details of the basis on which your personal data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;



- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at [privacy@consumer-ledger.com](mailto:privacy@consumer-ledger.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

- b. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing [privacy@consumer-ledger.com](mailto:privacy@consumer-ledger.com). If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

## 7. USE BY CHILDREN

We do not offer our products, Services and/or Website for use by children. If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

## 8. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Site enables you to interact with third parties that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

## 9. LOG FILES

We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the Site, track users’ movement around the Site, and gather demographic information.

## 10. COOKIES AND OTHER TRACKING TECHNOLOGIES

Our Site utilizes “cookies”, anonymous identifiers and other tracking technologies in order to provide our Site and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

## 11. ANALYTIC TOOLS

- **Google Analytics.** The Site uses a tool called “**Google Analytics**” to collect information about use of the Site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. We use the information we get from Google Analytics to maintain and improve the Site and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Addon, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Google Signals.** The Site uses a tool called “**Google Signals**” to collect information about use of the Site. When we activate Google Signals, some existing Google Analytics features are updated to also include aggregated data from Google users who have turned on “Ads Personalization” (Ads Personalization available at <https://support.google.com/ads/answer/2662856/>). Audiences that we create in Google Analytics and publish to Google Ads and other Google Marketing Platform advertising products can serve ads in cross device-eligible remarketing campaigns to Google users who have turned on Ads Personalization. Google Analytics collects additional information about users who have turned on Ads Personalization, base across device types and on aggregated data from users who have turned on Ads Personalization. The data is user based rather than session based. The Cross Device reports include only aggregated data. No data for individual users is ever exposed. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services in the Ads Personalization link above.
- **Firebase Analytics.** We also use a tool called “**Google Analytics for Firebase**” to collect data about app users, including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App. We do not facilitate the merging of personally-identifiable information with non-personally identifiable information unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. Finally, please note that Google Analytics for Firebase’s terms (available at <https://firebase.google.com/terms/>) shall also apply.
- **App Analytics.** We use a tool called “**App Analytics**” as a mobile analytics platform to measure app's performance by collecting information about users engagement and/or optimize marketing campaigns and/or monetization our users App. We use the information we get from App Analytics to maintain and improve our App. We do not combine the information collected through the use of App Analytics with personally identifiable information. You may learn more about how Apple App Analytics collects and processes data specifically in connection with Apple App Store Connect <https://developer.apple.com/app-store-connect/analytics/>.
- **Mixpanel.** We collect personally identifiable information such as your email address and your user activity through the use of Mixpanel. Mixpanel’s ability to use and share information is governed by the Mixpanel Terms of Use, available at <https://mixpanel.com/terms/>, and the Mixpanel Privacy Policy, available at <https://mixpanel.com/privacy/>. You can opt-out of Mixpanel’s services by clicking on the following link: <https://mixpanel.com/optout/>. If you get a new computer, install a new browser, erase or otherwise alter your browser’s cookie file (including upgrading certain browsers) You may also clear the Mixpanel opt-out cookie.
- **Facebook Pixels and SDKs.** We use Facebook pixels or SDKs, which are tools that provide help to app and website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from your apps and websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook’s ability to use and share information is governed by the Facebook Tools Terms, available at: [https://www.facebook.com/legal/technology\\_terms/](https://www.facebook.com/legal/technology_terms/). You may prevent your data from being used by Facebook Pixels and SDKs by exercising your choice through these mechanisms: <http://www.aboutads.info/> choices or <http://www.youronlinechoices.eu/>.
- **Advertising Partners.** Through our services, we allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile and/or website identifiers, page(s) visited, location, time of day). We also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners will use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We allow access to other data collected by the services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your Personal Information with third party advertising partners, you may let us know.
- **We reserve the right to use additional tools**

## **12. CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits our customers who 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 send an email to [privacy@consumer-ledger.com](mailto:privacy@consumer-ledger.com). Please note that we are only required to respond to one request per customer each year.

## **13. OUR CALIFORNIA DO NOT TRACK NOTICE**

We do not currently respond or take any action with respect to web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party web sites or online Services. We may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Site

## **14. DELETION OF CONTENT FROM CALIFORNIA RESIDENTS**

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information and you specify which content or personal information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

## **15. CONTACT US**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@consumer-ledger.com](mailto:privacy@consumer-ledger.com).