

# Privacy Policy

Date of Last Revision: October 14th, 2015

Our Privacy Policy explains how we collect, use, share, disclosure and protect information in relation to our mobile services, and any software provided on or in connection with Saferway, as well as Saferway brands, products and services (“**Saferway Service**” or “**Service**”), and your choices about the collection and use of your information. By accessing or using the Saferway Service, you signify that you have read, understood, and agree to the collection and use of your information as set forth in this Privacy Policy, and that we are providing Service for you to post content, including videos, text, graphics, photos or other materials (“**User Content**”), to the Service and to share User Content publicly. This means that other Users may search for, see, use, or share any of your User Content that you make publicly available through the Service, consistent with the terms and conditions of this Privacy Policy and our Terms of Service. When using any of our Service you consent to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Irrespective of which country you reside in or supply information from, you authorize Saferway to use your information in the United States and any other country where Saferway operates. Our Policy applies to all visitors, users, and others who access the Service (“**Users**”). The Service is owned or controlled by Saferway Mobile Inc. (“Saferway”). We may refer to “Saferway” as “we”, “our”, or “us” in the Terms. These Terms of Service affect your legal rights and obligations. If you do not agree to be bound by all of these Terms of Service, do not access or use the Service.

## 1. INFORMATION WE COLLECT

We collect the following types of information. Depending on which Service you use, we collect different kinds of information from or about you.

### **Information you provide us directly:**

We collect the content and other information you provide when you use our Service, including when you sign up for an account, create or share, and communicate with others. This can include information in or about the content you provide, such as the location of a video or the date a file was created. We also collect information about how you use our Service, such as the types of content you view or engage with or the frequency and duration of your activities.

- Profile information that you provide for your user profile (e.g., first and last name, email, picture, phone number).
- User Content (e.g., videos and other materials) that you post to the Service.
- Communications between you and Saferway. For example, we may send you Service-related emails. Note that you may not opt out of Service-related emails.
- Data collected through use of the Service. After you set up your account, we may ask for username, phone number, other profile and demographic information.

### **Account Information**

- **Google Account Information.** In order to use Saferway, you must sign in using your Google Account. If you do so, you authorize us to access and use certain Google Account information, including but not limited to your Google+ profile, and Google Drive. In addition, you authorize us to use, create, modify, delete, and share contents in your Google Drive. We may collect your personal information such as your username, first and last name, age range, gender, email address, a photo associated with your account, Google Drive content, etc. You can change username and mobile phone number on Saferway.
- **Facebook Account Information.** If you want to be a Hero, you must sign in using your Facebook Account. If you do so, we may collect your personal information such as your username, age range, email address, a photo associated with your account, a link to you timeline, whether the account has been verified, etc.

**Adding your friends on Saferway:**

- We may use the contact information to help connect you with other Saferway users, even if that information is not publicly displayed. You can find your friends through your device's contacts list, then Saferway will access your contacts list to add or invite your friends.

If you choose to invite someone to the Service through our "Add friends" feature, you may select a person directly from the contacts list on your device and send a text message from your personal account. You understand and agree that you are responsible for any charges that apply to communications sent from your device, and because this invitation is coming directly from your personal account, Saferway does not have access to or control this communication.

**Social Media:**

- When you interact with our site through various social media, such as when you Like us on Facebook or post a comment to our Facebook page, we may receive information from the social network such as your profile information, profile picture, gender, user name, user ID associated with your social media account, age range, language, country, and any other information you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to Saferway's website or Service.

**Analytics information:**

- We use third-party analytics tools to help us measure traffic and usage trends for the Service. These tools collect information sent by your device or our Service, including the web pages you visit, add-ons, and other information that assists us in improving the Service. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User.

**Cookies and similar technologies:**

- Saferway may use both session cookies and persistent cookies to better understand how you interact with our Service, to monitor aggregate usage by our users and web traffic routing on our Service, and to customize and improve our Service.
- When you visit our website or use our mobile app, we and our business partners may collect certain information about your computer or device through technology such as cookies, web beacons, log files, or other tracking/recording tools. The information we collect through the use of tracking technologies includes, but is not limited to, IP address, browser information, referring/exit pages and URLs, click stream data and how you interact with links on the website, mobile app, or Service, domain names, landing pages, page views, cookie data that allows us to uniquely identify your browser, browsing behavior on our site, mobile device type, mobile device IDs or other persistent identifiers, and location

data collected from your mobile device. Some or all of this data may be combined with other personally identifying information described above. We use this information to:

- Remember information so that you will not have to re-enter it during your visit or the next time you visit the site or mobile app,
- Provide custom, personalized content and information,
- Monitor the effectiveness of our Service and our marketing campaigns,
- Monitor aggregate metrics such as total number of visitors, users, traffic, and demographic patterns,
- Diagnose or fix technology problems reported by our Users or engineers that are associated with certain IP addresses or User IDs, and
- Automatically update our mobile application on your system and related devices.

**Log file information:**

- Log file information is automatically reported by your browser each time you make a request to access (i.e., visit) a web page or app. It can also be provided when the content of the webpage or app is downloaded to your browser or device.
- When you use our Service, our servers automatically record certain log file information, including your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our Users which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service.
- Our servers automatically record information ("Log Data") created by your use of the Service. Log Data may include information such as your IP address, operating system, location, your mobile carrier, device and application IDs, search terms, and cookie information. Saferway uses Log Data to provide our Service and to measure, customize, and improve them. If not already done earlier, we will either delete Log Data or remove any common account identifiers, such as your username, full IP address, or email address, after 18 months.

**Device identifiers:**

- When you use a mobile device like a tablet or phone to access our Service, we may access, collect, monitor, store on your device, and/or remotely store one or more "device identifiers." Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by Saferway.
- A device identifier may deliver information to us or to a third party partner about how you browse and use the Service and may help us or others provide reports or personalized content and ads. Some features of the Service may not function properly if use or availability of device identifiers is impaired or disabled.

**Location Information:**

- In addition to profile information, you may also tell us your exact location if you choose to enable mobile device to send us location information. We may use and store information about your location to provide features of our Service, and to improve and customize the Service.

- We collect your location and your unique user identifier through GPS, WiFi, wireless network triangulation, IP address geolocation in order to obtain your location for the purposes of providing our Service. We maintain location information only so long as is reasonable to provide the Service and then destroy the location data.

**Links:**

- We may keep track of how you interact with links across our Service, including our email notifications, third-party services, and client applications, by redirecting clicks or through other means. We do this to help improve our Service, for example to provide relevant advertising, and to be able to share aggregate click statistics such as how many times a particular link was clicked on.

**Third-Party Service:**

- Saferway uses a variety of third-party services to help provide our Service and to help us understand the use of our Service. These third-party service providers may use cookies and other technologies to collect information about your use of our Service and other websites and services, including your IP address, device ID, pages viewed, and links clicked.
- We engage service providers to perform functions and provide services to us in the United States and abroad. We may share your private personal information with such service providers subject to confidentiality obligations consistent with this Privacy Policy, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions.

**Things others do and information they provide:**

We also collect content and information that other people provide when they use our Service, including information about you, such as when they share a photo of you, send a message to you, or upload, sync or import your contact information.

## **2. HOW WE USE YOUR INFORMATION**

We are passionate about creating engaging and customized experiences for people. We use all of the information we have to help us provide and support our Service. In addition to some of the specific uses of information we describe in this Privacy Policy, we may use information that we receive to:

- help you efficiently access your information after you sign in
- remember information so you will not have to re-enter it during your visit or the next time you visit the Service;
- provide, improve, test, and monitor the effectiveness of our Service
- develop and test new products and features
- monitor metrics such as total number of visitors, traffic, and demographic patterns
- diagnose or fix technology problems

## **3. SHARING OF YOUR INFORMATION**

We will not rent or sell your information to third parties outside Saferway (or the group of companies of which Saferway is a part) without your consent, except as noted in this Policy.

#### **People you share and communicate with:**

- If you choose, you can use our “Safermode” feature to share your current location with your Friends. You choose among Friends who can see what you share.
- When you feel unsafe, you can use our "Help" feature. It starts when you scream, click volume down button (or power button with Android), or touch “Help” Button with iOS or Android devices, or blink your eyes with Google Glass. If you do so, you will share your current location, real-time video and your profile information (i.e., your user name, profile picture, gender, etc.) with all of your Friends and Heroes around you. If you do not want to receive help from Heroes, you can control it by changing the settings.
- If you receive “Help” alert from your Friend and touch “More Info” button, you will share your current location and profile information with everyone who received the alert. If you do not want to share it, you can exit the view.
- If you are a Hero and touch , you will share your current location and Facebook profile information with the user who send “Help” alert and all of the user’s Friends. If you do not want to share it, you can exit the view.
- When you share information or Content via the Service, you should think carefully about what and with whom you are sharing.

#### **Parties with whom we may share your information:**

- We may share your information as well as information from tools like cookies, log files, and device identifiers and location data, with third-party organizations that help us provide the Service to you ("Service Providers"). Our Service Providers will be given access to your information as is reasonably necessary to provide the Service under reasonable confidentiality terms.
- We may remove parts of data that can identify you and share anonymized data with other parties. We may also combine your information with other information in a way that it is no longer associated with you and share that aggregated information.

#### **What happens in the event of a change of control:**

- If the ownership or control of all or part of our Service or their assets changes (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation, reorganization), we may transfer your information to the new owner. You will continue to own your User Content. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

#### **Responding to legal requests and preventing harm:**

- We may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; or to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or

otherwise to prevent harm. We also may retain information from accounts disabled for violations of our terms for at least a year to prevent repeat abuse or other violations of our terms.

- Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect Saferway's rights or property. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information.
- Except as described above, we will not disclose personal information to third parties (including law enforcement, other government entity, or civil litigant; excluding our subcontractors) unless required to do so by law or subpoena or if in our sole discretion, we determine it is necessary to (a) conform to the law, comply with legal process, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce our Terms of Use, take precautions against liability, to investigate and defend ourselves against any claims or allegations, or to protect the security or integrity of our site; and/or (c) to exercise or protect the rights, property, or personal safety of Saferway, our Users or others.

#### **4. HOW WE STORE YOUR INFORMATION**

##### **Storage and Processing:**

- Your information collected through the Service may be stored and processed in the United States or any other country in which Saferway maintain facilities.
- Saferway may transfer information that we collect about you, including personal information across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction.
- By registering for and using the Service you consent to the transfer of information to the U.S. or to any other country in which Saferway maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.
- We use commercially reasonable safeguards to help keep the information collected through the Service secure and take reasonable steps to verify your identity before granting you access to your account. However, Saferway cannot ensure the security of any information you transmit to Saferway or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed.
- Saferway cares about the security of your information and uses commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information we collect and that we share with our service providers. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.
- Please do your part to help us. You are responsible for maintaining the secrecy of your password and account information, and for controlling access to emails between you and Saferway, at all times. Your privacy settings may also be affected by changes the social media services you connect to Saferway make

to their services. We are not responsible for the functionality, privacy, or security measures of any other organization.

## 5. YOUR CHOICES ABOUT YOUR INFORMATION

You may, of course, decline to submit any personal information through the Service, in which case Saferway may not be able to provide its Service to you.

### **Your account information and profile/privacy settings:**

- Update your account at any time by logging in and changing your profile settings.
- As noted above, you may not opt out of Service-related communications.
- You may modify your account information, update or amend your personal information.

### **How long we keep your User Content:**

- We store data for as long as it is necessary to provide products and services to you and others, including those described above. Information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services.
- You can delete your account any time. When you delete your account, we delete things you have posted, such as your videos. Following termination of your account, we may retain information (including your profile information) and User Content for a commercially reasonable time for backup, archival, and/or audit purposes.

## 6. CHILDREN'S PRIVACY

Our Service is intended to be used by children under 13 only with significant parental involvement and approval. If a parent wishes to add a User who is under 13 to the account, the parent must first complete the Parental Consent Form and return it via email. If you believe that we might have inadvertently collected information from a child under 13 without parental consent, please contact us at [support@saferway.io](mailto:support@saferway.io).

## 7. OTHER WEB SITES AND SERVICES

We are not responsible for the practices employed by any websites or services linked to or from our Service, including the information or content contained therein. Please remember that when you use a link to go from our Service to another website or service, our Privacy Policy does not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service and you allow them to access your User Content you do so at your own risk. Please read over those rules and policies before proceeding.

## **8. CHANGES TO OUR PRIVACY POLICY**

We may modify, revise or update this policy from time to time, so please review it periodically on the website. We'll notify you before we make changes to this policy and give you the opportunity to review and comment on the revised policy before continuing to use our Services. Your continued access or use of Saferway or the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.

## **9. HOW TO CONTACT US**

If you have any questions about this policy, please contact us at [support@saferway.io](mailto:support@saferway.io).

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