# **Privacy Policy**

Our Privacy Policy provides an explanation of how Convilu collects, uses, and shares information about you. The terms "Convilu," "we," "us," and "our" refer to Convilu LLC and its affiliates. The terms "member," "you," and "your" include any person using our Platform or attending related events, including organizations or individuals using the Platform on behalf of an organization. This Privacy Policy applies to the information we collect when you use our Platform, including our website, application, and services, or when you communicate with us. Please note that this policy does not cover the information you provide to third parties or share with other members. For more details about the scope of our Privacy Policy, please refer to Section 4.5.

To enhance understanding, we have provided summaries below, but it is important to read the entire policy carefully. If you want to access a specific section of the Privacy Policy, you can use the list provided to jump to that section.

## 1. Collection of Information

Summary: We collect information about you when you create an account, use the Platform, attend events, visit our website, or communicate with us. We also collect information through cookies, server logs, and similar technologies. If you use certain features, we may collect information from other sources like social media services, invitations, and imported contacts.

- 1.1 Information You Provide to Us: We collect information directly from you when you create an account, fill out forms, choose interests or groups, or communicate with us. This information may include your name, email address, postal address, phone number, payment details, demographic information, and other personal information you provide.
- 1.2 Information We Collect Automatically: When you use our Platform, we automatically collect information about your usage, such as log information, device information, geolocation information, and information collected through cookies and tracking technologies.
- 1.3 Information We Collect from Other Sources: We may obtain information about you from other sources, including social media services, member content, corporate affiliates, and third-party sources that provide publicly available data.

## 2. Use of Information

Summary: We use information about you to operate, improve, promote, and protect Convilu and our Platform. We also use it to communicate with you and personalize content.

- 2.1 Operating our Platform: We use your information to provide, maintain, and improve our Platform, personalize content, monitor trends, detect fraudulent activities, and perform administrative tasks.
- 2.2 Communicating With You: We use your information to respond to your inquiries, provide customer service, send you notifications and updates, and communicate with you about products, services, and events.

- 2.3 Advertising and Other Uses: We use your information to provide targeted advertising, deliver relevant content, conduct contests and promotions, and carry out other purposes described at the time of collection.
- 2.4 Legal Basis for Processing: We process your information based on legal obligations, our legitimate interests, and your consent, where applicable.

# 3. Sharing of Information

Summary: We only share information about you as described in the Privacy Policy. This includes sharing with members, social media services, service providers, analytics and advertising partners, authorities, affiliates, and in response to your directions. We may also share de-identified or aggregated information.

- 3.1 Through Our Platform: Some information you provide or generate on our Platform is shared with others based on your account settings. Certain information, like usernames and interests, may be public.
- 3.2 Venue and Group Networks: If you are a member of a venue or group, your information may be shared with network administrators within a our business network to facilitate group administration and communication.

# 3.3 Utilizing Service Providers

To operate and enhance the Platform, we may engage service providers for various business purposes. These providers assist us with tasks such as payment processing, email communication, surveys or contests, data hosting, ad management, and certain aspects of technical and customer support. Data analytics providers (as further discussed in Section 3.5 below) are among these service providers. They may access, process, and store information about you on our behalf, strictly following confidentiality obligations and for the purposes we have authorized.

## 3.4 Collaboration with Analytics and Advertising Partners

We may share the information we have collected about you with third parties or allow them to employ technologies (e.g., cookies, web beacons, device identifiers) that gather data about your use of the Platform and other websites or online services. The purpose is to provide analytical services and deliver advertisements for Convilu. For instance, we have partnered with Freestar to place ads on the Platform, and Freestar will collect and use certain data for advertising purposes. To learn more about Freestar's data usage, you can click here. Further details regarding these technologies and the information they collect, use, or share, including options to control or disable these services, can be found in our Cookie Policy.

Depending on your location, you may have the right to opt-out of sharing your personal information for targeted advertising purposes (ads tailored based on your activities on other sites and services). Convilu offers you the opportunity to opt-out of this sharing, as described in Section 5 below.

## 3.5 Compliance with the Law and Protecting Convilu

If we believe it is in compliance with applicable law, regulation, legal process, or audits, we may access, retain, and disclose information about you, including message content, to government entities and other third parties. We may also disclose information about you if we believe your actions are inconsistent with

our Terms of Service, related guidelines, and policies, or if it is necessary to safeguard the rights, property, or safety of Convilu or others, or to prevent fraud or abuse.

# 3.6 Social Sharing and Integrated Tools

The Platform may provide features for social sharing and integration with third-party services. These features enable you to share your actions on our Platform with third-party services and vice versa. Depending on your chosen settings, you can share information with your friends or the public through these features. For more information, you can refer to this article on Sharing Convilu events on Social Media and this article on Connecting your Social Media Account. The use of shared data by third-party services will be governed by their privacy policies, and we do not control how they use the shared data. To understand the purpose and extent of data collection and processing related to social sharing features, please review the privacy policies of the services providing these features.

# 3.7 Affiliate Sharing and Business Transfers

In the event of a merger, acquisition, financing, reorganization, bankruptcy, or sale of our assets, information about you may be shared, sold, or transferred as part of the transaction. We may also share information about you with current or future corporate parents, subsidiaries, or affiliates.

#### 3.8 Other Circumstances

We may de-identify or aggregate information about you and share it freely so that you cannot be personally identified. Such information is not subject to this Privacy Policy.

Additionally, we may share information about you with your consent or as directed by you, or when legally obligated to do so. For example, when you RSVP to an event, your information may be shared with event sponsors and others as disclosed to you. Furthermore, your information becomes accessible to other group members and event organizers when you RSVP for and participate in an event.

# 4. Additional Details:

#### 4.1 Transfer Of Information To The Netherlands

Convilu, which operates under EU law, processes, transfers, and stores information in the Netherlands and other countries. These countries may have different data protection laws compared to your country of residence. Convilu has implemented safeguards, such as standard contractual clauses, to ensure that your information remains protected in accordance with this Privacy Policy.

## 4.2 Security

Convilu employs technical and organizational measures to protect your information from unauthorized access, collection, use, disclosure, copying, modification, or disposal. These measures are in place during the transmission and storage of your information. For example, Convilu stores the information you provide on secure servers and utilizes security controls. Employees are trained on data privacy policies and procedures, and their access to personal information is authorized based on their role. Firewalls are used to protect against unauthorized access, and network vulnerabilities are regularly tested. However, it's important to note that no method of transmission or storage over the internet is completely secure.

If you have a password for accessing Convilu services, it is your responsibility to keep it complex, secure, and confidential. If you need to update or change your password, you can select the "Forgot your password?" link on the login page to reset it.

#### 4.3 Data Retention

Convilu retains certain information collected from you while you visit or are a member of the Platform. Even if you delete your account, some information may be retained for various business purposes, including:

Allowing you to use the Platform

Honoring your communication preferences

Providing refunds, if applicable

Providing accurate accounting information to other members regarding groups and memberships Understanding Platform traffic to enhance the user experience

Detecting and preventing abuse, illegal activities, and breaches of the Terms of Service

Complying with legal, tax, or accounting requirements

When there is no legitimate business need to process your information, Convilu will either delete it or take steps to de-identify or anonymize it in accordance with applicable law.

#### 4.4 Policy Scope

This Privacy Policy does not cover information you have provided or made accessible to third parties, including other members such as group organizers, network administrators, or those with whom you share information on Convilu. If Convilu directs you to a third-party service or if a portion of the Platform is controlled by a third party, the disclosure of information to such third parties is subject to their privacy policies. Convilu is not responsible for the privacy policies or content of these third parties, even if there are links to their services from the Convilu Platform or if information is shared with them.

Members, including venues, group organizers and network administrators, are responsible for complying with applicable privacy laws regarding the information they obtain and process for managing contacts, organizing and communicating with groups, or administering networks.

# 4.5 Revisions To This Policy

Convilu may update this Privacy Policy periodically. The most current version will be published, and the date at the top of the page will be revised accordingly. Depending on the circumstances, additional notice may be provided, such as through email or prominent notices on the Platform.

# 5. Your Choices:

# 5.1 Your Choices: Account Information

You have the option to review, change, or deactivate your account by accessing your account settings. However, certain information may still be retained by Convilu. You can also request information deletion by contacting Convilu via the provided email address. Additionally, you can choose what information others see about you and who can contact you by adjusting the Privacy Settings section in your Account.

## 5.2 Your Choices: Location Information

When you first access the Platform, Convilu may collect location information based on your device settings. This information is used to provide recommendations and

# 5.2 Your Choices: Location Information

When you first access the Platform, depending on your device settings, we will collect information about your location, which we use to make better recommendations for groups and events in your area, and to improve our Platform. If you do not want us to collect information about your location, then you can prevent this by taking the following steps:

If using a mobile app, by changing the settings on your device.

If using our website, your approximate location information will be obtained via a cookie. Please refer to our Cookie Policy for additional information on how to manage our use of cookies.

Note that our Platform or its features may no longer function properly if you change your settings.

Your mobile device settings may also give you the option to choose whether to allow us to view your geolocation on a continuous basis, only when using the app, or never. Allowing us to view your geolocation when you are not using the app allows us to provide you with recommendations on a regular basis. Please refer to your device's guide for additional information on how to adjust location services.

#### 5.3 Your Choices: Cookies

We may use and allow others to use cookies, web beacons, device identifiers, and other technologies to collect information about your use of the Platform and other websites and online services. See our Cookie Policy for details about these technologies and the information that they collect, use, or share, including how you may be able to control or disable these services.

As stated above in Section 3.4, depending on where you live, you may have the right to opt out of the sharing or processing of your personal information for purposes of targeted advertising (targeting ads based on consumer activity across other sites and services), and you may be able to use your Cookie Settings to select cookies you would like to opt opt-out of, including those used for targeted advertising purposes.

## 5.4 Your Choices: Promotional Communications

You can control some of the messages that you receive from Convilu and other members by selecting the unsubscribe link in the message that you receive, or by adjusting the communication preferences in your account settings. We will also send you a link to these settings when you first sign up and in subsequent messages. If you opt out, we may still send you non-promotional messages, such as those about your account or our ongoing business relations. In addition, please consult the privacy policies of other members for information about how to control or opt out of promotional messages from them off the Platform.

# 5.5 Your Choices: Photo Tagging

You can tag photos of yourself and others. When a photo has been tagged it means that the name of that person will appear alongside the photo, and the tagged photo will appear on the tagged member's group profile.

We will notify you when another member has tagged your account in a photo or when additional comments are added to such photos. You can remove tags by selecting the "untag" option next to your name. You can also report inappropriate content to Convilu. You are responsible for obtaining permission from non-members to post a photo of them on the Platform.

# 6. Data Rights

# Summary:

You may have the right to exercise data protection rights, including to request that Convilu deletes, amends, or provides you access to your information. You may have the right to opt out of the sharing or processing of your personal information for the purposes of targeted advertising. You have the right to opt out of receiving Convilu's promotional messages, but you may still receive other communications. You can complain to your local data protection authority about the use of your information. We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us with your request by sending an email to privacy@Convilu.com. You can also request deletion of your account and personal information by:

Filling out the form available in this Help Center article: "Request permanent deletion of your data." You must be logged in to your Convilu account to view this article and access the form. Clicking the "Delete account and personal information" link in your profile settings on the Convilu iOS

app. Venues and Organizers who want to delete their account and personal information from Convilu, should consult the Organizer Deletion Requests article in our Help Center for additional information, including information on how deleting your account will impact your groups. If you are an organizer, we will wait a few days to process your deletion request, and your request will be withdrawn if you create an event or RSVP to an event within 7 days of submitting your deletion request.

Rights that you may have, depending on the jurisdiction in which you live, may include:

Accessing, correcting, or requesting deletion of your information.

Appealing a decision Convilu has made about an access, correction, or deletion request.

Opting out of the sharing of your personal information for targeted advertising. To exercise your right to opt-out of these kinds of advertising, please follow the instructions found in the "Opting Out" section of our Cookie Policy and as described in Section 5.3 above.

Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.

Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the "unsubscribe" or "opt-out" link in the marketing emails we send you. Additionally, you may update your email preferences by changing the settings in your account.

Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.

Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection

authorities in the European Union are available here. Note that Convilu is a controller of your information. Other members, such as group organizers and network administrators, may also act as controllers of your information. You should contact these members if you have any questions about how they use information that you have provided to them. We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on the Platform may change or no longer be available to you.

# 7. Privacy Rights

Do-Not-Track Signals. Some mobile and web browsers transmit "do-not-track" signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

#### Contact Us

If you have any questions or inquiries, please feel free to contact us at <a href="mailto:privacy@Convilu.com">privacy@Convilu.com</a>. Under European data protection law, Convilu LLC is the controller of your information. For any questions or complaints regarding this Privacy Policy or the use of your information, please reach out to <a href="mailto:privacy@Convilu.com">privacy@Convilu.com</a>. If you are located in the European Economic Area, you can also contact Convilu's GDPR representative:

VeraSafe Ireland Ltd.

Unit 3D North Point House

North Point Business Park

**New Mallow Road** 

Cork T23AT2P

Ireland

Contact form: https://verasafe.com/public-resources/contact-data-protection-representative