

# Privacy Policy

THE WEBSITE [WWW.SHOUTOUT1.COM](http://WWW.SHOUTOUT1.COM) ("**COMPANY**" or "**WE**") OR MOBILE AND DESKTOP APPLICATIONS AND EXTENSIONS THEREOF (HEREINAFTER COLLECTIVELY REFERRED TO AS "**WEBSITE**"), SERVICES, FEATURES, CONTENT OR APPLICATIONS OFFERED THROUGH THE WEBSITE (HEREINAFTER COLLECTIVELY REFERRED TO AS "**SERVICES**") ARE GOVERNED BY THIS PRIVACY POLICY ("**PRIVACY POLICY**") READ WITH THE TERMS OF USE. ACCESSING, BROWSING OR OTHERWISE USING THE WEBSITE INDICATES YOUR AGREEMENT TO ALL THE TERMS AND CONDITIONS, SO PLEASE READ THEM CAREFULLY BEFORE PROCEEDING OR IF YOU ARE NOT AGREEABLE TO TERMS HEREIN PLEASE REFRAIN FROM USING THE WEBSITE.

This Privacy Policy highlights *inter alia* the type of data shared/collected from you in the course of your usage of the Website and/or the Services, the purposes for which your data is collected and the Website's policy with regard to sharing such personal information with third party entities. This Privacy Policy is subject to change at any time without notice and the Company encourages you to review this Privacy Policy periodically.

It is possible that other users (including unauthorized users or 'hackers') may post or transmit offensive or obscene materials on the Website and that you may be involuntarily exposed to such offensive and obscene materials. It also is possible for others to obtain personal information about you due to your use of the Website, and that the recipient may use such information to harass or injure you. We do not approve of such unauthorized uses, but by using the Website, you acknowledge and agree that we are not responsible for the use of any personal information that you publicly disclose or share with others on the Website. Please carefully select the type of information that you publicly disclose or share with others on the Platform.

This is the legal basis upon which we process your personal information as well. It is necessary for the performance of our obligations under the Terms & Conditions.

Privacy Policy applies to all users of the Services, including users who are also contributors of content. "**Content**" includes the text, software, scripts, graphics, graphics interchange formats, photos, sounds, music, videos, audio visual combinations, interactive features and other materials you may view on, access through, or contribute to the Services.

## OUR COMMITMENT TO GDPR

We recognise that protection of data is increasingly important to individuals, organizations and stakeholders. Accordingly, we process and manage personal data in accordance with applicable privacy laws, and specifically, in accordance with the EU General Data Protection Regulation. This Privacy Policy further explains our practices and processes with respect to handling of your Personal Data. If you're visiting us from the European Economic Area ("EEA"), you'll need to read this policy in light of the **EEA Users**:

**Collection and Use of Information:** To avail certain services on the Website, users may be required to provide personal and non-personal information from you ("Information"), like - a) your name, b) email address, c) sex, d) age, e) credit card or debit card details f) password g) your occupation, interests, and the likes. The Information as supplied by the users enables us to improve our sites and provide you the most user-friendly experience.

In connection with certain aspects of the Services, we may request, collect and/or display some of your personally identifiable information ("Personal Information"). All required information is service dependent and we may use the above said user information to, maintain, protect, and improve its services (including advertising services, conduct and administer any contest, or promotion you have entered) and for developing new services. We recommend you use your device's standard keyboard whenever entering credit card numbers, passwords or other sensitive information. If you enter any of this information into the Company's content library search input area, Company will receive it. Company uses reasonable efforts to remove this type of information from its records, but cannot guarantee that it will be able to do so.

The Website uses third party services that may collect information used to identify you. Link to privacy policy of third party service providers used by the Website:

- Google Analytics and Google Play Services
- Firebase Analytics
- Facebook
- Crashlytics

The information that any Third Party collects is subject to their privacy practices (including whether it shares information with us, the types of information shared, and your choices about what may be visible to others).

We may also use the information telling you about products or services, promotions, offers, features and competitions we believe you may be interested in. You can choose not to receive direct marketing communications or opt-out/unsubscribe at any time by following the instructions contained in any marketing emails received. Factual communications with respect to the Services will not be affected by such opt-out.

We may also send you information within the Website using what are called push notifications. You may at any time opt-out from receiving such notifications by turning them off in your settings on the device you use to access the App.

**DISCLOSURE TO USERS: TRANSFER OF PERSONAL INFORMATION BETWEEN COUNTRIES:**

Your information will be collected, processed and stored directly on or transferred to entities and parties may be located outside of your country of residence and that transfers to the same may include transfer to, and processing in, countries such as the United States and Australia.. In addition, it may be transferred to other countries where the Company or our vendors maintain facilities or business operations, which may include countries outside the European Economic Area.

If you do not agree to the collection, processing, storage and transfer of your information, please do not provide your information to us and stop using our Website. If you have questions, please contact our data security officer at [contact@shoutone1.com](mailto:contact@shoutone1.com)

**DURATION:** Your Personal Information will not be kept for longer than is necessary to fulfil the specific purposes outlined in this Privacy Policy ("Defined Period"), and to allow us to comply with our contractual and legal requirements.

Any data we hold onto will be anonymous, personally identifiable information such as your name, address, date of birth and emailID will be deleted after a Defined Period. The rest of the data is therefore anonymous and will be used to analyze general market and Website trends but without identifiable personal information.

When you request that we delete your personal information or your account, we will take commercially reasonable steps to remove it from our active databases but will keep original information consistent with our business practices (e.g. for purposes of dispute resolution, enforcement of agreements, complying with legal requirements, enforce our Terms of Use and any other applicable terms and policies, including for investigations of potential violations, record keeping, backup, and document retention). Copies of some materials such as log records may remain in our database but are disassociated from personal identifiers. In any case, we will not retain or use your personal information longer than necessary for the purposes outlined in this Privacy Policy.

**AGGREGATED AND ANONYMISED INFORMATION:** We may share with third parties or/and use aggregate user statistics and other data which does not identify you specifically. We may combine this information with that of other users of our Website and share or provide this information in aggregated and anonymised form with third parties such as universities, service providers, subject matter experts or use the same for product enhancements and developments. We may at any point anonymise personal information to make sure that such information can no longer be related back to you. We do all this to help us improve the design and delivery of our Apps and to assist in research and development.

**COOKIES:** To improve the responsiveness of the sites for our users, the Website and third parties with whom we partner, may use cookies, pixel tags, web beacons, mobile device IDs, "flash cookies"

and similar files or technologies to collect and store information with respect to your use of the Services and third-party websites.

Cookies are small files that are stored on your browser or device by websites, Apps, online media and advertisements. We use cookies and similar technologies for purposes such as:

- Authenticating users;
- Remembering user preferences and settings;
- Determining the popularity of content;
- Delivering and measuring the effectiveness of advertising campaigns;
- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

A pixel tag (also called a web beacon or clear GIF) is a tiny graphic with a unique identifier, embedded invisibly on a webpage (or an online ad or email), and is used to count or track things like activity on a webpage or ad impressions or clicks, as well as to access cookies stored on users' computers. We use pixel tags to measure the popularity of our various pages, features and services. We also may include web beacons in e-mail messages or newsletters to determine whether the message has been opened and for other analytics.

We want to inform you that whenever you use our Service, in case of an error on the Website we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the Website when utilizing our Service, the time and date of your use of the Service, and other statistics

To modify your cookie settings, please visit your browser's settings. By using our Services with your browser settings to accept cookies, you are consenting to our use of cookies in the manner described in this section.

We may also allow third parties to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs and other technologies to identify your device when you visit the Website and use our Services, as well as when you visit other online sites and services. We do not control their process of collection use and storing of information.

To get information about Flash and Adobe's privacy choices from Adobe, [click here](#). To get information about cookies from All About Cookies.org, [click here](#). If you disable cookies, adjust privacy settings on your device, restrict local storage, or otherwise limit these technologies, you may not be able to use some of our Website's features.

Company does not currently honor "Do Not Track" signals. For information about "do not track" from The Future of Privacy Forum, [click here](#).

**LINKS TO THE OTHER SITES:** Our policy discloses the privacy practices for our own Website. Our Website provides links to other websites also that are beyond our control. We shall in no way be responsible for your use of such links and sites.

**INFORMATION SHARING:** We do not share Personal Information with any third party without obtaining the prior consent of the user except in the following limited circumstances:

1. If you share the content with another user of our Services or if you are creating published collections of the Content, your account name and profile will be associated with the Content you upload, will be visible to anyone who views the Content you have uploaded, and may be visible to the public. In addition to any information you may elect to place in your account profile, your account profile will also include certain information regarding your use of the Services, including but not limited to the Content collections you have published, number of other users you follow, and the number of users who follow you.
2. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offenses. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing these Terms; for complying with the applicable laws and regulations.
3. With our service providers or our affiliated companies in order to provide and distribute the Services and their functions, the Website, its other services, and related services and support; to complete billing and payment for them; or to collect information and communicate with you as described above.
4. In connection with the transfer, sale, merger or reorganization of all or any relevant portion of its business or assets to or with any third party.

**Force Majeure:** Under no circumstances will we be held liable for any delay or failure in performance due in whole or in part to any acts of nature labor disputes, strikes, acts of God, floods, lightning, severe weather, shortages of materials, rationing, inducement of any virus, Trojan or other disruptive mechanisms, any event of hacking or illegal usage of the website, utility or communication failures, earthquakes, war, revolution, acts of terrorism, civil commotion, acts of public enemies, blockade, embargo or any law, order, proclamation, regulation, ordinance, demand or requirement having legal effect of any government or any judicial authority or representative of any such

government, or any other act whatsoever, whether similar or dissimilar to those referred to in this clause beyond our reasonable control.

**MANAGING YOUR INFORMATION:** If for any reason you wish to access, view, correct, or update personal information collected about you, send us a mail at [contact@shoutout1.com](mailto:contact@shoutout1.com)

**EEA Users:** For privacy-related information applicable to people located in the EEA: We process your information for the purposes set forth below.

**Legal Basis for Processing Information:** We process your information where we can rely on legal grounds to do so.

**Performance of the Services:** We process your information for the performance of our Services and Website, to provide or support our Services, or for any other reason you request or enable. This includes, for example, using your information to:

- administer your Website account; conduct and administer any contest, or promotion you have entered;
- support purchases you make, including, but not limited to, processing payments and orders;
- support the Website functionality; maintain our Website and Services and in accordance with this Privacy Policy and the applicable Terms of Service; and provide customer service and support.

If you are a celebrity or influencer, we also process your information to assist you in offering "Shoutouts" as well as receiving payments from the third-party payment provider, if applicable.

**AI Shoutouts:** Our AI Shoutouts product collects only the personal information necessary to provide and enhance our services, such as your name and any content you submit. This information is used solely to generate personalized AI-powered shoutouts and is not shared with third parties without your explicit consent. We employ industry-standard security measures to protect your data. By using AI Shoutouts, you agree to the collection and use of your information in accordance with this policy.

**Consent:** We process your information based on your consent. This processing includes, for example, providing you with: newsletters, direct e-mails and surveys about our Services and Website; and certain other marketing features.

Where we rely on your consent in order to process your personal information, you have the right to withdraw your consent to further use of your personal information at any time. You can unsubscribe to the services to update your marketing preferences or delete your account.

**Legitimate Interest:** We process your information when we have a legitimate interest to do so. This includes, for example, processing your information to:

- provide you with requested customer service or technical support;
- debug and improve our Website;
- provide you with certain content, personalize your Website experience with us and contact you in accordance with your applicable marketing preferences; and
- establish, exercise, or defend legal claims or in connection with any court or jurisdiction.

You can request more information regarding our legitimate interest balancing test where this is our lawful basis by contacting us at: [contact@shoutout1.com](mailto:contact@shoutout1.com)

**Legal Obligation:** We process your information for compliance with any legal obligation to which we are subject.

**Your Rights to Your Information:** You have rights to view, correct, and update your information as set forth in **Managing Your Information** above, to access or remove your personal information. In certain circumstances, you can request that we transfer personal information that you have provided to us.

**Your Right to Object:** You may object to the processing of your personal information based on a legitimate interest on grounds relating to your particular situation. You may, in particular, control the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. To do so, you can use the methods described in the **Consent** above .

**Exercising Your Rights and Complaints:** For each of the rights described above, you can also send your request to us on the Website where so available or send us a mail at [contact@shoutout1.com](mailto:contact@shoutout1.com). Your right to file complaints with a data protection supervisory authority in the country where you live or work or where you consider a breach has occurred remains unaffected.

**International Transfers:** Your information will be collected, processed and stored directly on or transferred to entities and parties may be located outside of your country of residence and that transfers to the same may include transfer to, and processing in, countries such as the United States and Australia. In addition, it may be transferred to other countries where the Company or our vendors maintain facilities or business operations, which may include countries outside the European Economic Area.

You explicitly consent to the transfer. If you do not agree to the collection, processing, storage and transfer of your information, please do not provide your information to us and stop using our Website. If you have questions, please contact our data security officer at [contact@shoutout1.com](mailto:contact@shoutout1.com)