

# Privacy Policy

## Introduction

Shopguide, Inc., a Delaware corporation ("Shopguide," "we," or "us") is committed to protecting and respecting your privacy. This Privacy Policy (together with our Terms of Use <https://my-shop-guide.com/termsfuse.pdf>) applies to the Shopguide website at [www.my-shop-guide.com](http://www.my-shop-guide.com) and any of its subdomains ("Site") and the Shopguide mobile application (the "Application") (collectively, the "Service") and sets out the basis on which any personal data we collect from you, or that you provide to us, will be handled by us.

**In this Privacy Policy, the term "personal data" means information that relates to an identified or identifiable natural person.**

We know that you are concerned about how we use and disclose personal data, and we are committed to complying with data protection and privacy laws that apply to us. This Privacy Policy tells you about the ways in which we protect your privacy and the personal data we process about you.

We wish to remind you that this Privacy Policy applies to personal data that we process when you use the Service. It does not apply to any links to third-party websites or services, such as third-party applications or websites, that you may encounter when you use the Service, in particular, websites of third parties offering items for sale through the Application ("Sellers"). We encourage you to carefully familiarize yourself with privacy policies applicable to any websites or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

By using the Application, you agree to the privacy practices described in this Privacy Policy.

## Information We May Collect from You

### (i) Data You Provide to the Service

We may collect the following information from our users that may, in certain circumstances, constitute personal data:

- Name;
- E-mail address;
- Telephone number;
- Credit or debit card information, including credit or debit card type, number, verification number, expiry date and billing address.
- Mailing address;
- Photographs you upload through the Application;
- History of and data about your transactions on the Application;
- Sellers' pages you follow;

- Your Facebook or VKontakte profile; and
- Any other information you provide to us.

(ii) Data Collected Automatically

The Service may automatically collect the following information from you that in certain circumstances may constitute personal data:

- We and our third-party partners use cookies, web beacons, Flash cookies (locally stored objects), embedded scripts, location-identifying technologies, **and similar technology (collectively, “tracking technologies”)**. These tracking technologies collect information about how you use the Service (e.g., the pages you view, the links you click, and other actions you take on the Service), information about your browser and online usage patterns (e.g., IP address, browser type, browser language, referring / exit pages and URLs, pages viewed, whether you opened an email, links clicked), and information about the device(s) you use to access the Service (e.g., mobile device identifier, mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, and depending on your mobile device settings, your geographical location data (which could include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device), or we may be able to approximate a device’s location by analyzing other information, like an IP address.
- We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service.

The Purposes for which We Use the Data

We use the collected personal data for the following purposes:

- To communicate with you;
- To process your transactions;
- To enable payments;
- To prevent and investigate fraud, unauthorized use, and other misuses;
- To operate and improve the Service;
- For market research;
- To send you advertising messages;
- To audit and analyze the Service; and
- To ensure the technical functionality and security of the Service.

We use the data collected automatically for the following purposes:

- To improve customer service;
- To personalize user experience;
- To provide features available in the Service;
- To develop, improve, and protect the Service;

- For market research;
- To audit and analyze the Service;
- To ensure the technical functionality and security of the Service;
- To link your various devices so that content you see on one device can result in relevant advertising and content displayed on another device, and so that we may recognize and contact you on the various devices you may use;
- To remember information so that you will not have to reenter it during the next time you use the Service; and
- To monitor aggregate metrics such as total number of visitors, traffic, and usage on the Site.

#### How We Disclose Data

We do not sell, lease, rent or otherwise disclose the personal data relating to our users to third parties unless otherwise stated below.

The personal data collected in the Service may be disclosed in the following manner:

(i) Personal data you provide to the Service:

We may disclose personal data you provide to the Service with the following categories of third parties:

- To service providers, such as payment processors and data storage service providers, which enable us to provide the Service to you;
- To public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties;
- To our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Service and their advisors in connection with a corporate merger, consolidation, restructuring, or the sale of substantially all of our stock or assets or other corporate reorganization, in accordance with this Privacy Policy;
- To Sellers, if you purchase items from them;
- To other third parties, if we determine that such disclosure should be made for reasons of national security, law enforcement, or other issues of public importance; and
- To other third parties, if we secure your prior consent to such disclosure.

(ii) Data collected automatically:

The data collected automatically in the Service may be disclosed to the following categories of third parties:

- To service providers, such as data analysis companies;
- To public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties; and
- To our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Service and their advisors in connection with a corporate merger,

consolidation, restructuring, or the sale of substantially all of our stock or assets or other corporate reorganization, in accordance with this Privacy Policy.

Moreover, we may disclose information to third parties in an aggregate format that does not constitute personal data and does not allow the identification of individual users.

## Your Rights

You have the following rights with respect to the personal data we hold about you:

- The right to know what data we hold about you. If you would like to know what personal data we hold about you, please contact us at [info@my-shop-guide.com]. We seek to promptly respond to your inquiry.
- The right to have incomplete, incorrect, outdated, or unnecessary personal data corrected, deleted, or updated. The easiest way to correct, delete, or update the personal data you have provided to the Service is to log in to the Service and enter the necessary changes in the account settings of the Service. If you have additional questions regarding the correction, deletion, or updating of the personal data we hold about you, please contact us at [info@my-shop-guide.com].
- The right to opt out of receiving electronic direct marketing communications from us: All electronic direct marketing communications that you may receive from us, such as email messages and text messages, give you the option of not receiving such communications from us in the future. If you have any additional questions about electronic direct marketing received from us, please contact us at [info@my-shop-guide.com].

## Data Security

We take our role in safeguarding information about you seriously. We maintain a security program that draws on industry standards and best practices. We take a defensive, in-depth approach to implementing physical, administrative, and technical safeguards to protect information against unauthorized access or misuse. The safeguards include preventive, detective, and corrective controls. In addition, we use:

- *Passwords*. You should never share your password with anyone. We will never ask for your password by phone or email. If you ever receive a communication claiming to be from Shopguide that asks for your password, you should immediately report it by contacting us at [info@my-shop-guide.com].

We also periodically review and adjust security safeguards as the threat landscape evolves. Ultimately, 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, our policy is to take reasonable steps to investigate the situation and, where appropriate, communicate with affected individuals.

## International Transfers of Personal Data

Information collected through the Service may be stored and processed in the United States or any other country in which we or our affiliates or service providers maintain facilities. 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, and you consent to the transfer of information to the U.S. or any other country in which we or our affiliates or service providers maintain facilities and to the use and disclosure of information about you as described in this Privacy Policy.

### **Children's Privacy**

You must be at least 18 years of age to register with and use the Service. This Service is not directed to children under 13. We do not intend to collect personal data from children under 13.

### Changes to the Privacy Policy

From time to time we may change this Privacy Policy. You can tell when changes have **been made to the Privacy Policy by referring to the "Last Updated" legend** at the top of this page. If we materially change the ways in which we use and disclose personal data, we will post a notice in the Service and send an e-mail to our registered users. Your continued use of the Service following any changes to this Privacy Policy constitutes your acceptance of any such changes made.

### Questions or Concerns?

Should you have any questions regarding this Privacy Policy, your privacy as it relates to the use of the Service, or the protection of the personal data we hold about you, please contact us via e-mail at [info@my-shop-guide.com] or by mail at Shopguide, Inc., [220 East 23rd St, suite 400; New York, NY 10010], Attention: Privacy. We seek to promptly resolve any concerns you may have.