

PRIVACY POLICY

This Privacy Policy is effective as of October 1st 2015.

thumbroll LLC (“*thumbroll*,” “we,” “us,” or “our”) receives your information through the website available at <http://thumbroll.com/>, short message service (SMS), application program interfaces (APIs), email communications, applications (including mobile applications), buttons, widgets, ads, and other services provided by *thumbroll* (together, the “Services”), and from third parties.

By accessing and using our Services, you consent to the collection, transfer, storage, disclosure, and use of your information as described in this Privacy Policy.

What information do we collect?

Information that you provide to us directly:

- Your name, username, password, e-mail address, age, and/or phone number when you create a user account.
- Your contact information, such as e-mail address or phone number, and other contact information that you grant *thumbroll* access to, such as your contacts list.
- Information you provide as part of your user profile (e.g., a photo, biography, location, or website).
- Communications between you and *thumbroll*. For example, if you e-mail us, we may keep your message, e-mail address, and contact information to respond to your inquiry.
- Any information you submit, post, publish, upload, display, or transmit on or via the Services (e.g., photos, comments, and other information and materials).

Information about your activity while engaged with the Services:

- Lists you create, your search queries, “favorites,” “likes,” and friend requests (incoming and outgoing) associated with your account.
- Your interactions with third party links and third party services accessible via our Services.
- Other data from your device, such as location information from a global positioning system (GPS), information about wireless networks or cell towers near your mobile device, or your internet protocol (IP) address.
- Identifying information about your mobile device, including data stored in connection with the operating system or other software, or data sent to the device by *thumbroll*.

- We receive log data when you interact with our Services, for example, when you visit our website, sign into our Services, interact with our email communications, use your account to authenticate to a third-party website or application, or visit a third-party website that includes a *thumbroll* button or widget. We may also receive log data when you click on, view or interact with links on our Services, including links to third-party applications. Our servers may record certain log data such as search terms, IP address, browser type, operating system, referring / exit pages and URLs, browsing history, number of clicks and how you interacted with the Services, domain names, landing pages, location, mobile carrier, device information, and other related information.
- Metadata associated with user content. For example, metadata may indicate how, when, where, and from whom, content was collected, and how the content is formatted.
- Like many websites, we also use “cookies” to enhance your experience and gather information about visitors and visits to our site. Please refer to the “Do we use ‘cookies’?” section below for information about cookies and how we use them.

Information from third parties:

- We use third-party services in order to provide our Services, such as hosting content. We also use third-party analytics tools to collect data about traffic and usage trends for the Services. These third parties may collect information sent by your device or our Services, such as cookies or your IP address. We may also receive information about you from our affiliates in order to provide, understand, and improve our Services and our affiliates’ services.
- Some of the Services provide the ability to interact with third party services (e.g., third-party social media sites). When you choose to permit such interaction, we may receive additional information about you from the third party (e.g., your registration or profile information with the third party service).

How do we use your information?

We may use the information we collect in the following ways:

- To help you efficiently access your information after you sign in.
- To remember information so that you do not have to re-enter it.
- To perform actions at your direction, such as when you authorize a third-party web client or application to access your account.
- To personalize your experience with the Services and to allow us to deliver the type of content and services in which you are most interested.

- To provide, improve, test, and monitor the effectiveness of our Services.
- To develop and test new services and features.
- To update the Services on your device.
- To allow us to better serve you in responding to your customer service requests.
- To send you information about our Services, to market to you, to help prevent spam, fraud, or abuse, and to help others find your account, including through third-party services and client applications.
- To monitor metrics such as total number of visitors, traffic, and demographics.
- To provide contests, special offers, or other activities relating to the Services. However, you may choose not to participate in such events.
- We may share your information with companies that are affiliated with *thumbroll* to help provide, understand, and improve our Services and the affiliates' services.
- We may remove identifying data from your information and share the data anonymously with other parties. We may also combine your information with other information so that it is no longer associated personally with you, and share that aggregated information.
- We may share or disclose your non-private, aggregated, or otherwise non-personal information, such as your public user profile information, public comments, the people you follow or that follow you, or the number of clicks associated with a particular link.
- Other users may share or disclose information about you through their use of the Services.

How do we store and process your information?

We implement commercially reasonable security measures to maintain the safety of your personal information. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. When you access your personal information, we offer the use of a secure server. All sensitive/credit information you supply is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our databases to be accessed only as stated above.

However, *thumbroll* cannot guarantee the security of any information you transmit to *thumbroll* or guarantee that the information may not be accessed, disclosed, altered, or destroyed. Further, *thumbroll* is not responsible for the functionality, privacy, or security measures of any other organization.

Do we use “cookies”?

Yes. We may use cookies and similar technologies such as pixels, web beacons, and local storage to collection additional information about how you use our Services. Cookies are small files that a site or its service provider transfers to your computer’s hard drive through your Web browser (if you allow) that enables the site’s or service provider’s systems to recognize your browser and capture and remember certain information. For instance, they are used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Google Chrome or Internet Explorer) settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to many features that make your site experience more efficient and some of our services will not function properly.

Do we disclose the information we collect to outside parties?

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice, except as described below. The term “outside parties” does not include hosting partners and other parties who assist us in operating our Services, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our policies, or protect ours or others’ rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Your information collected through the Services may be stored and processed in the United States and any other country in which *thumbroll*, it affiliates, or service providers operate. Please note that different countries may have different data protection laws, and as such, we may transfer information, including your 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 Services, you consent to this transfer of information and the use and disclosure of information about you as described in this Privacy Policy.

If *thumbroll* is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. This Privacy Policy will apply to your information as transferred to the new entity.

How can you opt-out, remove or modify information you have provided to us?

If you are a registered user of our Services, you may access, correct, delete, or modify the personal information you provided to us and associated with your account by logging into your account settings. You may also unsubscribe from e-mail communications by clicking the “Unsubscribe” link provided in such communications. Please note that due to e-mail production schedules you may receive some emails already in production.

If your account is terminated or otherwise deactivated, whether by *thumbroll*, yourself, or anyone else, your data (including your profile information) and content will no longer be accessible through your account, but that data and content may persist and appear within the Services. Please note that search engines and other third parties may still retain copies of your public information, such as your user profile information and public posts, even after you have deactivated your account.

Third Party Links and Services

In an attempt to provide you with increased value, we may include third-party links on our Services. These linked sites have separate and independent privacy policies. *thumbroll* is not responsible for the practices employed by any websites or services linked to or from our Services, including the information or content contained within them. Please remember that when you use a link to go from our Services 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 content. If you are using a third-party website or service and you allow them to access your content, you do so at your own risk.

Children’s Privacy

thumbroll does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register for the Services. The Services and their content are not directed at children under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 without parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at info@thumbroll.com.

Questions and Feedback

We welcome your questions, comments, and concerns about this Privacy Policy. Please send us any and all feedback pertaining to privacy, or any other issue, via email to info@thumbroll.com.

Online Policy Only

This online privacy policy applies only to information collected through our online Services and not to information collected offline.

Terms of Use

Please also visit our Terms of Use section establishing the use, disclaimers, and limitations of liability governing the use of our Services.

Changes to Our Privacy Policy

We may modify or update this Privacy Policy from time to time, so please consult this Privacy Policy regularly. Policy changes will apply only to information collected after the date of the change. Your continued use of the Services after any modification to this Privacy Policy will constitute your acceptance of such modification.