

EveryTown Privacy Policy

Your Privacy Protecting your privacy is one of our top priorities. Please take a few minutes to read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This Privacy Policy (“Privacy Policy”) discloses the privacy practices for ShopEveryTown.com (collectively “EveryTown”) with regard to your (“You” or “Your”) use of the application (the “App”). By using our app, you confirm that you accept the terms of our User Terms and Condition and this Privacy Policy.

If you do not agree to the terms of this Privacy Policy, you must not use the App.

Our privacy commitment

This document sets out the basis on which we will process any personal data we collect from you on this App. The App is designed for small businesses to increase business by means of the tools incorporated within the app. Who can see which parts of the App and which parts are open and have varying degrees of controls, are set out in our Terms and Conditions (clause 5, “Types of Users”).

We will make every effort to protect your privacy from those you do not wish to share information with, by informing you as to how your data will be used, adopting a consistently high level of app security and adhering to strict company policies on how we store and use personal information. This privacy policy has been developed in accordance with our legal obligations and may be updated from time to time. We would again like to stress that, in accordance with European personal data protection laws, strict security procedures are observed to prevent personal data misuse and unauthorized access.

1. Use of Personal Information

1.1. The information collected by Us through our App is used by Us for various purposes to enable Us to serve You better including:

- a) To find third party service providers;
- b) Internal record keeping;
- c) To improve Our products and services;
- d) To periodically send promotional emails or messages on the App about new products, special offers or other information which We think You may find interesting using the email address which You have provided; or
- (e) Information to customize the App according to Your interests from time to time.

1.2. We may use personal information to resolve disputes that may arise with the use of Our Services, help promote a safe service to all the customers, measure consumer interest in Our services, customize Your experience, detect and protect Us against error, fraud and other criminal activity, enforce Our terms and conditions.

1.3. We identify and use Your IP address to help diagnose problems with Our server, and to administer Our Apps. Your IP address is also used to help identify You and to gather broad demographic information.

1.4. We may use the information from your phone contact list to generate recommended users or connection to follow.

2. Sharing of Personal Information

2.1. We may disclose Your personal information if required to do so by law or in the good faith and belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process. We may disclose personal information to law enforcement offices, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to enforce Our Terms or Privacy Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of Our customers or the general public.

2.2. We and Our affiliates will share some or all of the collected information with another business entity should We (or our assets) plan to merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business. Should such a transaction occur that other business entity (or the new combined entity) will be required to follow this Privacy Policy with respect to all the information collected.

2.3. We do not disclose personal information about identifiable individuals to advertisers, but We may provide economic development research partners with aggregate and/or anonymized information about You to help advertisers reach the kind of audience they want to target. We may make use of the information We have collected from You to enable Us to comply with Our advertisers' wishes by displaying their advertisement to that target audience.

3. Information Safety

3.1. All information is saved and stored on servers which are secured with passwords and pins to ensure no unauthorized person has access to it. Once your information is in Our possession we adhere to strict security guidelines, protecting it against unauthorized access. EveryTown acknowledges the importance of and is committed to maintaining the security of all information received. However, no method of transmission over the internet, or method of electronic storage is 100% secure or fool proof. Therefore, while EveryTown strives to use commercially acceptable means to protect the Personal Data; EveryTown cannot guarantee its absolute security.

4. What information is being collected and how is it used?

4.1. The nature of the personal shopping data we collect from you provide Our research partners information to predict consumer shopping trends.

What data we collect and how this is used is set out in detail in this policy but general categories of data we may collect include:

– information that you provide by filling in forms on our app which may include: your name,

address, email address, city, and payment details (if applicable);

– technical information about your use of EveryTown and specifically EveryTown services including details of your domain name, location and internet protocol (IP) address, operating system, browser version, the content you view and how long you stayed on a page. This information contain no personal information about you;

– data collected through the use of “cookies” and/or other devices; and

– other data from time to time to help us provide you with improved products and services

– for example when we ask you to fill in a survey or questionnaire.

4.2. In addition to any other uses specified set out in this Privacy Policy, we may use information provided by you in any one or more of the following ways:

– to ensure that content on our app is presented in the most effective manner for you;

– to monitor, develop and improve our products and services;

– to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;

– to allow you to participate in interactive features of our service, when you choose to do so;

– for non-marketing purposes – guidance for which is provided in section 6 below;

– to notify you about changes to our service including to contact you with service messages. By way of example, we may contact you to let you know that a challenge or flash sale has ended and inform you of any similar services offered by us and/or any company within our group of companies and/or a third party partner on our behalf

4.3. EveryTown maintains a strict “No-Spam” policy, which means that EveryTown does not intend to sell, rent or otherwise give your e-mail address or your personal information to a third party without your written consent.

5. What data do we collect for each type of user?

There are two types of App users:

(i) Registered Users,

(ii) Unregistered Users (please refer to the description of these types in our Terms & Conditions).

5.1. Registered Users

The information we will collect from you is set out on the registration form, which includes your email address, medical license number, the regulatory body with which you are registered, your specialty, legal name and current work location.

We may at any time seek additional or alternative verification information from members to ensure that the relevant user is a licensed Physician. You can set your personal privacy options so that access to your profile information is limited. We cannot, however, control the actions of other users who may choose to allow access to their profile information. Whenever you create content on, or post content to, the App other registered users may see your name and other details such as your specialty and country of registration. Other information may be displayed in your profile if so selected by you when customizing your profile.

5.2. Unregistered Users (visitors, including those who have requested to register, but have not been accepted yet to the platform)

For unregistered users the data we will collect from you is described below in clause 5.

6. What information is collected from the App?

Some detail around access and use of data on the certain sections of the App is set out below:

6.1. Your profile

All Registered Users have the option of creating a profile for themselves and to tell other users about themselves. You may provide additional information describing your credentials, professional experiences, academic background, biography and the like. You will be able to select which information you wish to display and to whom (connections, anyone) and any mandatory information will be indicated. Providing additional information in your personal profile beyond what is required at registration is entirely optional and can be altered or removed by you at any time. We may share information in your profile without your name and contact details with third parties. We do this for purposes such as aggregating how many registered people on the App are, for example, cardiologists, so that we can improve the App.

6.4. We collect certain information about You to help Us serve You better.

The information collected by Us is of the following nature:

- Name;
- Telephone Number;
- Email Address;
- Profession;
- Information about Your device; and
- Network information

6.5. Information provided during Registration:

To create a profile and use this App and services, You may be asked to provide the following information: Your name, Your username, Your photograph, password, email address and Your area of interest (selected from a drop-down menu if applicable), speciality, MCI registration number, Bio, Educational history, Hospital Affiliation and Awards and recognition.

6.6. You are solely responsible for:

- maintaining the strict confidentiality of Your Account credentials,

- not allowing another person to use Your Account to access the Services,
- any and all damages or losses that may be incurred or suffered as a result of any activities that occur in Your Account,

6.7. Searching for other users:

Any registered user can use the people search function to search for other Registered Users. The search provides the full name, country and specialty of EveryTown Registered User, but does not provide his or her full profile information, unless allowed by him/her. Registered Users only, will have the option of sending these users a request to connect as colleagues. Private messages, may be exchanged only among already connected to each other users.

7. Additional uses we will make of your data

7.1. We may use your data to respond and or monitor (as we determine) for any unauthorized use of our App or any content within. If you post any content in breach of our User Terms & Conditions, which involves any indication of violence or threats of violence or any similar act, we may at our absolute discretion inform any relevant third parties including without limitation the police and other law enforcement agencies. We may disclose any of your details to our legal advisors should we require advice around any disclosures.

7.2. In addition to ensuring you can use this app properly, on some occasions we use the information provided to produce aggregate statistics in relation to pages being accessed. We may also use it to monitor usage patterns on the App in order to improve navigation and design features to help you get information more easily. This information is provided to us as daily logged files. In order to help us develop the App and our services, we may provide such aggregate information to third parties. The statistics however will not include any information that can be used to identify any individual.

8. What else do we collect when you use the App

Each time you use the internet, an Internet Protocol (IP) address is assigned to your computer or internet-capable device via the internet service provider. This number may either be the same or different each time you access the internet. Each time your computer or internet-capable device requests information from our App, we log your IP address on our server and may log operating systems and browser types for system administration and to report aggregate information. We may use this in order to gather information about the App traffic and usage. Whether you are an Unregistered or Registered User, our web server collects certain information such as (a) IP address; (b) host names (c) domain name (d) time and date information as requested (e) the browser version and platform when it is requested, (f) a record of which pages have been requested; (g) location data from your IP address.

Location data may be necessary for us to “geo-block” or regionalize our App content or services.

If you contact us, we may keep a record of that correspondence and use it to contact you in response and/or to update our records.

In addition to responding to complaints or claims received or discovered referred to above or any breaches of our User Terms and Conditions, we may use all information supplied or collected on this App to enforce our legal rights and protect against unauthorized access, use,

activity and/or copying, either personally or via third party contractors and advisors. This may involve using any details supplied by you including your name and contact details.

9. When will we contact you?

You are always given the opportunity to opt in or out (as applicable) from receiving marketing emails from the EveryTown and third parties. For users who have opted to receive marketing emails from EveryTown (and others where indicated and there is a jointly supplied product or service), and visit our Apps through links provided in these emails, we may send information about your App usage to our third party email direct marketing provider, however will not include any information that can be used to identify any individual. This is for the purpose of understanding the effectiveness of our email marketing campaigns and for targeting future email campaigns. We may send you non marketing emails or other non-marketing communications, the nature or purpose of these emails and communication may include but shall not be limited to:

- welcoming you to the EveryTown community and encouraging you to join discussions;
- internal record keeping;
- providing you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- where you have indicated your consent to be contacted for these purposes: allowing you to participate in interactive features of our service, this may include sending email prompts and reminders to you after long periods of your inactivity on the app or to alert you to responses which have been made to your Discussions or Article posts by other users of the App;
- periodical updates regarding activities in groups, discussions or other app parts that you may have been registered into;
- notifying you about changes to our service including to contact you with service messages. By way of example, if any service for which you have registered is no longer available, we may contact you to let you know that it has closed and inform you of any similar services offered by us and/or any company within our group of companies and/or a third party partner on our behalf; and
- periodically (though not at an excessive frequency) sending you emails about EveryTown updates and functionality.

Within each such non-marketing email, you will be given the option to unsubscribe from these non-marketing emails. We will send you strictly service-related announcements on rare occasions when it is necessary to do so.

For instance, if our service is temporarily suspended for maintenance, we might send you an email. EveryTown communicates via e-mail with you to provide requested services and to resolve issues relating to your account.

Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

10. How long do we keep the information we collect?

We keep your personal information for as long as necessary to fulfill our obligations to you and to protect our legal interests.

11. Use of cookies

Once you have accessed the App, we may store a temporary 'cookie' on your computer, indicating that you are authorized to use the app. Cookies are small text files that are saved by your web browser and enable you to move throughout the app without having to sign in each time you look at a different page.

We cannot identify you from these cookies. They simply tell us whether pages have been requested by the same person or two different people. In addition we also have non expiring cookies which will identify when the same user (or user from the same terminal) returns to the app. We do this to assist with the user experience and so we can restore the last used screen when new pages are loaded. If you wish to delete such cookies, please refer to the instructions for your file management software to locate the file or directory that stores cookies. We may from time to time use cookies to identify the nationality of our users which enables us to present users with appropriate corporate branding and to conduct surveys as mentioned above. More information about Cookies, including how to block them and/or delete them, can be found at www.aboutcookies.org. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our app.

12. How we share Personal Information with other parties

We may share your Personal Information with other third parties in the following manners: Service providers under contract who help with parts of our business operations (e.g., marketing, technology services), though we require that these service providers only use your information in connection with the services they perform for us and not for their own benefit; To a parent company, any subsidiaries, joint ventures, or other companies under a common control (collectively, 'Affiliates'), in which case we will require our Affiliates to honor this Privacy statement; To a company that merges with us, acquires us, or purchases our assets, in which case such company may continue to process your Personal Information as set forth in this Privacy statement; Law enforcement, government officials, or other third parties when we are compelled to do so by a court order or similar legal procedure we need to do so to comply with law we believe in good faith that we need these information to protect or defend the rights or property of Company or users of the software or other services.

Other third parties with your consent or directed to do so, except as set forth above, we do not sell, share, rent or trade your personal information or geo-location information other than as disclosed within this privacy policy.

The Company may share aggregated information that includes non-identifying information and log data with third parties for industry analysis and demographic profiling.

13. How personal information is stored and protected

Your personal data is stored in our databases and is only available to web administrators of EveryTown. The data that we collect from you may be transferred to and stored at a destination inside the European Economic Area (“EEA”). We will take all steps reasonably necessary to ensure that your data is treated securely by us and our contractors and in accordance with this privacy policy. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our app, you are responsible for keeping this password confidential. Please do not share your password with anyone.

13.1. Security

We understand that the security of your information is important to you. We also understand that our continued success on the web relies on our ability to communicate with you in a secure manner. We adhere to the highest standards of decency, fairness, and integrity in our operations. We use several measures to authenticate your identity when you visit our app. We also take steps to protect your information as it travels the internet, and to make sure all information is as secure as possible against unauthorized access and use (for example, by hackers). We review our security measures regularly.

Despite our best efforts, and the best efforts of other firms, ‘perfect security’ does not exist on the internet, or anywhere else. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our app; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

13.2. Authentication

You should not share your user name and password with other people. If you think you might lose or forget these identifiers, we will help you recover your login details securely.

13.3. Email

Any email between you and EveryTown is not encrypted.

13.4. Data within our walls

The information we collect about people visiting the app is stored in secure environments which are not available to any unauthorized individual or party. We have mechanisms in place to protect data. One such mechanism is called a “firewall”. A firewall is a barrier that allows only authorized traffic through. It safeguards our computer systems and your information. We also use system and application logs to track all access. We review these logs periodically and investigate any anomalies or discrepancies.

14. Your Rights regarding your Data

You are entitled to the following rights, to the extent applicable and permissible by law. You can access or request these rights by signing into your account, or by contacting us at info@EveryTown.com as applicable:

- the right to be informed about the collection and use of your data: you can review the information contained in this Privacy Policy or can contact us for more detailed information
- the right of access to the data you have provided to us: you can view this data by signing in to your account or contacting us for more detailed information
- the right to rectification of your data: you can request for inaccurate or incomplete data to be rectified or completed, respectively; we will take any reasonable steps to do so
- the right to erasure of your data: you can request us to erase personal data if you would like to withdraw consent for its processing; we will take any reasonable steps to do so as applicable by law
- the right to restrict processing of your data: you can request us to restrict processing your personal data; we will take any reasonable steps to do so as applicable by law
- the right to portability of your personal data: you can request us to provide you with a copy of the personal data we have collected and stored; we will take any reasonable steps to do so as applicable by law
- the right to object to processing of your personal data: you can request us to stop processing your personal data; we will take any reasonable steps to do so as applicable by law
- the right not to be subject to automated decision-making including profiling, which produces legal effects concerning you or similarly significantly affects you: our services are not intended to produce legal effects concerning you or similarly significantly affect you. If for any reason you would prefer not to use our services or restrict your data processing you can request so (either through one of your other rights or specifically for this), and we will take any reasonable steps to do so as applicable by law.

If you have any questions or concerns about our privacy policies, please contact us at info@EveryTown.com.

15. Your consent

By submitting your information, you consent to the use of that information as set out in this policy. You should review this policy regularly, to note any changes as to how we collect and use personal information.

Thank you for reviewing this information.

If you have any questions, please send us an e-mail at info@EveryTown.com.