

# Sample Website/Mobile App Privacy Policy

Effective Date: [DATE]

Company, Inc. ("Company") takes the privacy and security of personal information very seriously. As such, we have prepared the following Privacy Policy to provide you with information about how your data is collected, used, shared, transferred, and protected as a result of your interaction with [URL] (the "Site") and the [APP] (the "App") (collectively, the "Services"). By using the Services, you agree to the following Privacy Policy. If you disagree with any of the provisions described below, your remedy is to stop using the Services immediately.

## Information Collection

Visitors to the Site and users of the App ("Visitors") can browse without providing personal information.

When you interact with the Services, we may ask you to provide your [LIST PERSONAL INFORMATION COLLECTED]. It is your decision to use the Services, and, as such, any provision of this personal information is completely voluntary.

In order to access [SPECIAL SERVICES], you may be required to provide [LIST PERSONAL INFORMATION].

### *Information Collected Through the App*

When you interact with the App, we may also collect some information from your mobile device. Specifically, we may collect:

- [PHOTOS]
- [YOUR CONTACT LIST]
- [PRECISE GEOLOCATION] of the mobile device used to operate the App. We will only collect precise geolocation data if you provide your consent to such collection. Please note that if you decline to provide consent to collect geolocation, certain features of the App may not be available to you.

We also collect certain non-personal information such as your browsing history on the Services, the length of time spent on certain pages, the website Uniform Resource Locator ("URL") from the website you were visiting before coming to this Site, which URL you next visit, device type, what browser you are using, Internet service provider, date/time of visit information, operating system, and your Internet Protocol ("IP") address.

## Information Use

We will use the personal information to [INCLUDE ALL USES OF PERSONAL INFORMATION]:

- provide you with the Services;
- fulfill your order;
- respond to your requests;
- communicate with you; and
- provide you with offers and promotions that we feel may be of interest.

We will use the non-personal information we collect to:

- conduct statistical analysis of the Site;

- troubleshoot service issues or interruptions;
- update and improve the Site;
- understand the demographics of our users and their browsing habits; and
- serve you with promotional messages and advertisements, both while you are on the Site and after you leave our Site and continue to browse online.

## **Cookies**

Cookies are small files that are sent to and stored in your computer by the websites you visit. Cookies are stored in your browser's file directory. Cookies may be stored only for the time you are in a given site or they may remain stored in your browser for a defined period of time beyond your current session. Cookies work in combination with content within the website itself, to capture and remember information. To learn more about these technologies and how they work, please see [www.allaboutcookies.org](http://www.allaboutcookies.org).

We use cookies and other similar technologies (such as web beacons and pixels) to collect and process non-personal information.

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 can review the options available to manage cookies in your browser. One option is to disable, or turn-off, all cookies. If you turn cookies off, you may not be able to browse the Sites. If you disable certain kinds of cookies, some aspects of our Sites may not function properly or as well.

## **Information Sharing**

We may share personal information to the following entities and/or for the following reasons:

- **Affiliates/Partners.** We may work with our affiliates or partner with other companies in order to provide our Users with additional benefits. In the event that we enter into such a partnership, we may share your personal information with those partners. If we share personal information, we will require that such partners use the personal information for the limited purpose for which we provide it, maintain reasonable security measures for the protection of such information, and comply with the provisions as outlined in this Privacy Policy.
- **Law Enforcement.** Occasionally we may be required by law enforcement or judicial authorities to provide personal information. We will disclose personal information upon receipt of a court order, subpoena, warrant, or other legal process to the extent necessary to meet legal, national security, public interest, or law enforcement obligations. We fully cooperate with law enforcement agencies in identifying those who use our Services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.
- **Merger.** In the event that Company enters into an agreement to be purchased by another company or to merge with another company, we may share personal information with that company. We will require that such purchasers continue to comply with the provisions as outlined in this Privacy Policy.

We may also share non-personal information with select third parties, such as our advertisers, for purposes of serving you with customized promotions. If you would like to learn more about the sharing of non-personal information for purposes of providing

customized advertisements or promotions, please visit <http://www.aboutads.info/consumers/>.

### **Your Choices**

You may have choices when it comes to the collection, use, and sharing of your personal information.

[EMAIL UNSUBSCRIBE]

[OPT-IN/OPT-OUT RE ONLINE BEHAVIORAL ADVERTISING]

### **Log-In Through Social Networks**

You have the option of signing up for the Service through Facebook, Google, or other social networks. Logging in through these social networks may allow Company to access certain public information related to your profile. When you sign in through one of these social networks, you will be asked what information you would like to share. It is up to you what to share with Company, or whether anything at all from your social network profile is shared at all.

### **Links to Third Party Sites**

An important part of our Service is to provide you with links to third party websites so that you can browse those sites for items that may be of interest and make purchases. Company is not responsible for the collection, use, or sharing of your personal information once you leave our Site or App and follow a link to one of these third party websites. Please consult each linked website's privacy policy for a description of how the website collects, uses, and shares your information.

### **Children's Information**

The Services [ARE/ARE NOT] intended for children under the age of 13 years old. [MUST INCLUDE COPPA COMPLIANCE IF SITE IS INTENDED FOR/DIRECTED AT CHILDREN] OR [We do not knowingly collect information from children under the age of 13. If we discover that we have information from a child under the age of 13, we will delete it immediately. If you believe that a child under the age of 13 may have provided his or her information to us, please contact us using the contact information below.]

### **Do Not Track**

[DO YOU track personal information about user's online activities over time and across third-party Web sites or online services?] [DO YOU allow third parties to collect personal information about user's online activities over time and across different Web sites when users use the Service?] [DO YOU respond to Web browser "do not track" signals?]

### **Cross-Border Transfer of Data**

[INCLUDE LANGUAGE ABOUT RELEVANT DATA TRANSFER MECHANISM, AS APPROPRIATE] OR [We are located in the United States. If you are not a resident of the United States, your country's laws governing data collection and use may differ from those in the United States; in particular, the United States may not provide the same level of protections as those in your own country. By using the Site or providing your personal information to Company,

you are transferring your information to the United States, and you consent to the transfer, retention, and processing of such data in the United States. If you do not agree with such transfer, retention and processing in the United States, please do not use the Services.]

### **Security**

We understand the importance of information security and will take reasonable measures to protect the security and confidentiality of your information. [INCLUDE DETAILS ABOUT SECURITY, AS APPROPRIATE] Please understand that no measures can guarantee 100% security.

You are responsible for the security of your log-on information. Please do not share your log-on password with anyone. If you believe your log-on password has been compromised, please contact us immediately.

### **Changes to this Privacy Policy**

We reserve the right to make changes to this Privacy Policy. We will post changes directly to this Privacy Policy, so it is your responsibility to check back here from time to time to review this Privacy Policy. If we make a material change in the type of information we collect or its use, we will provide advance notice of such change, and obtain your consent for the new collection or use, as required by law.

### **Contact Information**

If you have any questions or concerns about this Privacy Policy, please contact us using the information below.

[COMPANY CONTACT INFORMATION]