

GROOVL PRIVACY POLICY

Effective Date: December 14, 2021

GENERAL

At GROOVL (Groovl LLC) we respect and take steps to protect your privacy. We strive to make our site a safe environment for everyone who visits and uses GROOVL services. We are committed to providing you the best possible online service and experience as well as the best products and services. The purpose of this policy statement is to fully share with you:

- How we use the information
- With whom we share the information
- How you can change the information

This policy addresses our practices with respect to our website, but does not address the practices of any website we link to (including the merchants and content providers we link to). This policy is incorporated into, and subject to the terms of, our Terms & Conditions.

HOW WE USE INFORMATION COLLECTED

We use information which you provide us to keep track of the GROOVL services you have signed up to receive. We may also use personally identifiable information about you to improve our marketing and promotional efforts, to statistically analyse site usage, to improve our content and product offerings and to customise our site's content and layout. We do this in an attempt to improve our site and better tailor it to meet our users' needs. We may also use personally identifiable information about you to deliver information to you that, in some cases, is targeted to your interests, such as targeted banners and promotions. We use your email address to contact you regarding administrative notices or latest news from time to time.

We use personally identifiable information that you have provided to us, including your email address and mobile number, to contact you via SMS or email with administrative notices, news or promotions from time to time.

On the other hand, upon account registration, you are by default, opted-out of receiving a weekly account balance update newsletter and you will not receive this communication until you select to opt-in on the registration form. You may also opt-in or unsubscribe from receiving this weekly Balance Update newsletter at any time by logging into your account and enabling or disabling this newsletter feature in your account preferences.

On the other hand, upon registration, you are by default, opted-in to receiving occasional promotional emails and SMS', usually once every week or two. You will continue to receive these promotional communications for as long as you are an active customer of GROOVL, until you select to unsubscribe from them by clicking on the "unsubscribe" link at the bottom of the promotional emails or by replying "STOP" to the SMS'.

We use information in the file we maintain about you, and other information we obtain from your current and past activities on the site, to resolve disputes, troubleshoot problems and enforce our Terms and Conditions.

PROTECTION OF DATABASE INFORMATION

Any information sent to GROOVL for text messaging and or storage purposes will remain the property of the account holder. GROOVL will at no time collect or redistribute this information without your consent, except where legally required by law to do so. This is with particular reference to any database, numbers and/or recipient details that you may deliver to us, or store on our databases.

DISCLOSURE OF YOUR INFORMATION

We do not sell or rent any personally identifiable information about you to any third party. We do aggregate personally identifiable information and disclose such information in aggregate to advertisers and for other marketing and promotional purposes. However, in these situations, we do not disclose to these entities any information that could be used to personally identify you. GROOVL offers features on our site where we will by necessity need to provide some of your information to the third party offering such services. To the extent that that third party requires your information to enable you to use their service, we will notify you of the specific information that will be provided to such third parties. Before you use the service you should evaluate whether you will accept the terms and conditions of the third party service, and give GROOVL the right to pass your information on to that third party. In addition, we must comply with court orders, information requests from government agencies and regulators and other legal and regulatory processes that may require the disclosure of your personally-identifiable information.

For those users who make purchases at our website, we, through our third-party payment processor, may collect IP address, browser version and other information about the software and hardware resident on the computer used to make the purchase. This information is passed on to and used by our third-party payment processor solely for purposes of authentication and security. By making a purchase at our website you authorize such collection and use.

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. We use SSL encryption technology to protect the transfer of your information.

ADVERTISING TECHNOLOGY

Display Advertising. We use third-party advertising technology to serve ads when you visit our website and sites upon which we advertise. This technology uses information about your visits to this website and the sites upon which we advertise, to serve our ads to you. In the course of serving our advertisements to you, unique third-party cookies may be placed or recognized on your browser. In addition, we may use Web beacons, provided by our third-party ad server, to help manage and optimize our online advertising. These Web beacons enable our ad server, on our behalf or on behalf of our agent, to recognize a browser's cookie when a browser visits this site, and to learn which banner ads bring users to our website. Our third-party ad server is performing its functions on our behalf or on behalf of our agent, and we may, directly or indirectly, instruct such ad server to enable other service providers to receive information about our site related to our online advertising. To learn more about our third-party ad-serving and advertising partners, cookies, and how to "opt-out" please click [here](#).

Email Advertising. We share web site usage information about visitors to our web site, who have received a targeted promotional campaign, with a reputable third-party advertising company for the purpose of targeting future campaigns and upgrading visitor information used in reporting statistics. For this

purpose, we and our third-party advertising company note some of the pages you visit on our web site through the use of pixel tags (also called clear gifs).

OUR COMMITMENT TO CHILDREN'S PRIVACY

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our website from those we actually know are under 13, and no part of our website is structured to attract anyone under 13.

FREQUENTLY ASKED QUESTIONS

Q: Will you send advertising text messages to my cell phone, without my consent?

A: No, we will not send you unwanted advertising text messages. We may initiate a program whereby we send advertising text messages to cell phones. However, this will be an opt-in-based service. You will decide if, and when you want to receive advertising on your cell phone.

Q: I am getting spammed on my cell phone. What's happening?

A: One of the services, provided by GROOVL, allows visitors and members to send text messages to friends, family, colleagues, using the GROOVL Interface. The GROOVL Interface conditions of use forbid spamming to cell phone users and several software filters are in place to block spammers. However, we cannot guarantee that no spamming will ever occur. You have the possibility to block your phone from receiving any message from GROOVL or GROOVL members by clicking on the 'anti-spam' link on the home page. [Reviewing/Changing Your Information](#)

If at any time you would like to change any information in your account, Login from the home page. Here you can change or update your information. You must click preferences to maintain new changes.

DATA DELETION REQUEST

If you need to delete your data from the Groovl.com servers for any reason, please do the following:

1. Sign in to Groovl Account
2. Click the ACCOUNT menu, and navigate to the Account Information.
3. In the CLOSE AN ACCOUNT SECTION, click CLOSE ACCOUNT.
4. Click SUBMIT.

Once data deletion is in progress, you no longer have the option to cancel the request.

LIMITS ON OUR ABILITIES

Although your privacy is very important to us, due to the existing legal and technical environment, we cannot ensure that your personally identifiable information will not be disclosed to third parties in ways not described in this policy. Additionally, we can (and you authorize us to) disclose any information about you to private entities, law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate to address or resolve inquiries or problems. This will not be done for commercial purposes or gain from GROOVL as such.

If you have further questions about our privacy policy or its implementation, please [Contact Us](#).

You acknowledge that acceptance of this privacy policy is a condition to your use of our services and you agree to be bound by all of its terms and conditions.