



Effective Date: November 1, 2016

This Privacy Policy ("**Privacy Policy**") explains how Giverly International, Inc. ("Giverly", "us", "our", and "we"), collects and uses information when you interact with us. This Privacy Policy applies to all users of Giverly's website published at www.giver.ly (and any other websites with "Giverly" branding that link to this Privacy Policy) and any mobile-device applications we offer, such as our iOS and Android applications, that are branded "Giverly" and link or reference this Privacy Policy (collectively, the "**Services**").

Please read this Privacy Policy carefully. This Privacy Policy replaces and supersedes the last version of this Privacy Policy for all users (including for those users that registered prior to the Effective Date). If you do not agree to our practices, please do not register, subscribe, create an account, or otherwise interact with the Services. Your use of the Services is also subject to our [Terms of Use](#).

Please [Contact Us](#) if you have any questions or comments about our privacy practices or this Privacy Policy. You can reach us via postal mail at the following address:

Giverly International, Inc.
Attention: Legal Department
16 E. Ave. A., Suite 211
Temple, Texas 76501
844-448-3759

1. Types of Personal Information We Collect

Personal Information is information that can be used to identify, locate, or contact an individual. It also includes other information that may be associated with Personal Information. We collect the following types of Personal Information:

- **Contact Information** that allows us to communicate with you, such as your name, postal addresses, email addresses, social media website user account names, telephone numbers, or other addresses at which you receive communications from or on behalf of Giverly.
- **Relationship Information** that helps us to understand who you are and what types of stores, products, and advertisements you might like. This includes lifestyle, preference, and interest information; the types of coupons that interest you; information collected from social media interactions (such as via Facebook Connect); and demographic information (e.g., birth date, age, gender, zip code).
- **Transaction Information** about how you interact with the Services, such as the coupons you view and redeem, the gift cards you purchase or sell via our Services, the digital rebates that you claim, including copies of receipts that you submit; other information about how you use our Services, email, other communications, and applications; and how you interact with Giverly's merchants, business partners, and service providers after interacting with our Services, including, in some cases, the items you purchase from those merchants.



- **Location Information** that allows us to periodically determine your geolocation, such as your location relative to nearby merchants or, your presence within a mall or store (e.g., near a checkout, aisle, or entrance) or your state/province, city, or neighborhood.
- **Analytics Information** about your use of our Services, such as your IP address, access time, device ID or other unique identifier (e.g., Android advertising ID or Apple IDFA), domain name, screen views, language information, device name and model, operating system type, and your activities on our Services. For example, information collected by our Services via a mobile device may include the following: (i) the names of the other applications on your mobile device and, if you use an Android-based mobile device, how you use them (e.g., frequency and duration of use); (ii) if you use an Android-based mobile device, the URL addresses of the webpages you access; (iii) information about your mobile device (e.g., make, model, operating system, and other similar information, but not phone number); (iv) information about your use of features, functions, or clicks on notifications or content; and (v) the strength of signal, temperature, battery level, and unique identifier of a nearby Bluetooth® proximity beacon.

2. How Giverly Collects Personal Information

We may ask you for Personal Information when you register, subscribe, create an account, or otherwise interact with the Services or contact Giverly. For example, you may be required to provide us with Contact Information or Relationship Information in order to register for certain services.

We collect Personal Information when you use our Services on one or more of your devices that interact with the Services. For example, we may track the coupons you view, submit or redeem via a desktop computer, the gift cards that you purchase from us via your mobile device, and the comments you make to the forums, bulletin boards, discussion groups, chat rooms or other methods of communication that may be offered on or through the Services from time to time (collectively, "**Communities**"), or to those related to our social media pages or accounts. We use cookies and related technologies to collect information about your computer and your interaction with the Services and our business partner websites. You can read more about cookies and other technologies in the [Cookies and Related Technologies](#) section.

We also collect Personal Information if you contact us via telephone, email, text, postal mail, social media interaction, or other methods of communication, such as for customer support purposes.

If you use a social media platform, a mobile device or other third-party method of communication to interact with Giverly or the Services, that platform may have a specific privacy statement that governs the use of Personal Information related to that platform. If you have questions about the security and privacy settings of your mobile device, please refer to instructions from your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

If you use the Services on a mobile device and your mobile device's settings allow it, we may collect Personal Information from your mobile device. For example, if you have permitted your mobile device to transmit location data, we may collect your geolocation and time of day. In addition, if you have also enabled Bluetooth® functionality on your mobile device, our Services may determine your presence and duration within a location, such as a mall or store, based on the detection of signals from nearby



Bluetooth® proximity beacons. Our application may be designed to collect information even if you are not logged into one of the Services. In some cases, for example, we may use your Internet Protocol ("IP") address to estimate your general location even if you have not logged in or enabled location tracking on your mobile device.

From time to time, we may also supplement Personal Information with information collected from third parties, including demographic information, information about your interests, and similar information that the third parties have collected from other sources (which may include analytics data from third party websites). For example, we may collect information from third parties to enhance other information we have about you, to help us better understand you, to provide you with targeted advertising, and to otherwise enhance the Services.

3. How Giverly Uses Personal Information

Giverly uses Personal Information to:

- Operate and improve our Services;
- Provide users with content and advertisements across their devices for products and services from merchants, including coupons based on variables such as stated and anticipated user interests, personal characteristics, and location;
- Evaluate eligibility of users for certain coupons, products or services;
- Evaluate the types of coupons, products or services that may be of interest to users;
- Track redemption of coupons and perform other analytics;
- Provide user support, including to merchants or business partners;
- Fulfill requests for Giverly services;
- Communicate and provide additional information that may be of interest to you about Giverly and featured merchants and business partners, such as Giverly news, special offers and coupons, announcements, and marketing materials;
- Send you reminders, technical notices, updates, security alerts and support and administrative messages service bulletins, or marketing;
- Provide commercial notifications when you arrive at, linger near or leave places;
- Infer the location of the places you visit most often, determine your frequency at these locations, and send notifications when you arrive at or leave those places;
- Provide advertisements to you through the Services, third-party sites, email messages, text messages, mobile-push notifications, or other methods of communication;
- Administer surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our partners;
- Create user profiles that may contain inferences about users such as age range, income range, gender, and interests;
- To help verify accounts and activity, and to promote safety and security on and off of our Services, such as by investigating suspicious activity or violations of our terms or policies and assessing the relative risk that a particular activity (e.g., the purchase or sale of a gift card) may be unauthorized or fraudulent;
- Manage our everyday business needs such as website administration, forum management, analytics, fraud prevention, Terms of Use or to comply with the law;



- Allow you to apply for a job, post a video or sign up for special offers from third parties through the Services; and
- Carry out other purposes that are disclosed to you and to which you consent.

4. When and Why Giverly Discloses Personal Information

We may share your Personal Information as required or permitted by law as described below:

- With affiliated companies (e.g., subsidiaries and other companies owned by or controlled by Giverly) who may only use the Personal Information for the purposes described in Section 3 above;
- With our service providers that provide services for us to assist us in carrying out the purposes described in Section 3 above such as sending emails, push notifications, or SMS messages on our behalf, assessing potential fraud (such as in connection with the purchase or sale of gift cards) and conducting surveys or sweepstakes on our behalf. Gimbal, Inc., for example, is a service provider that enables certain geo-location features of our mobile-device applications. Consequently, Gimbal, Inc. and its affiliates collect, store, and process, on Giverly's behalf, certain Location Information and related data on servers in the United States. Our service providers are bound by law or contract to protect Personal Information and are only allowed to use the Personal Information in accordance with the terms of our service agreements with them. In some limited cases, such as for purposes of investigating suspicious activity and assessing the likelihood for fraud, some of our service providers may use the Personal Information that we provide them for the purpose of improving their own services;
- Merchants, but only to the extent you have redeemed a coupon offered by the merchant, or participated in an offer, contest or other activity sponsored or offered through Giverly on behalf of the merchant;
- Giverly business partners or advertisers, as part of an offer, contest, or other activity that is provided by or in conjunction with Giverly and its business partners and in which you have elected to participate. For example, if you are referred to Giverly from a business partner's website or through an invitation facilitated by or in conjunction with a Giverly business partner, Giverly may provide that business partner with Contact Information and Transactional Information to validate the referral and to support the terms of the relationship between Giverly and the business partner, which may allow such business partner to contact you directly and to advertise to you;
- To effect a merger, acquisition, or otherwise; to support the sale or transfer of business assets; to enforce our rights or protect our property; to protect the rights, property or safety of others, investigate fraud, respond to a government request; or as needed to support auditing, compliance, and corporate governance functions. We may also disclose Personal Information to defend ourselves in litigation or a regulatory action, and when required or advised to do so by law, such as in response to a subpoena, a reporting requirement or similar legal process, including to law enforcement agencies, regulators, and courts in the United States and other countries where we operate. If Giverly is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or prominent notice on one or more of our Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information; or
- Otherwise with your consent.



We encourage Giverly merchants and business partners to adopt and post privacy policies. However, the use of your Personal Information by such parties is governed by the privacy policies of such parties and is not subject to our control. When you choose to interact with a Giverly merchant or business partner, we encourage you to read any privacy policy they may have posted on their website.

We may also disclose information about you that is not personally identifiable. For example, we may provide merchants, business partners, or other third parties with reports that contain aggregated and statistical data about our users.

5. Cookies and Related Technologies

When you use our Services, we collect certain information by automated or electronic means, using technologies such as cookies, pixel tags, web beacons, browser analysis tools, and web server logs. As you use our Services, your browser and devices communicate with servers operated by us, our business partners and services providers to coordinate and record the interactivity and fill your requests for services and information.

The information from cookies and related technology is stored in web server logs and also in web cookies kept on your computers or mobile devices, which are then transmitted back to our Services by your computers or mobile devices. These servers are operated and the cookies managed by us, our business partners or our service providers.

For example, when you access our Services, Giverly and our service providers may place cookies on your computers or mobile devices. These cookies may include means for tracking your Transaction Information with a Merchant and may include tracking technology from third-party affiliate-network operators like Commission Junction. Cookies allow us to recognize you when you return, and track and target your interests in order to provide a customized experience. They also help us detect certain kinds of fraud.

A "**cookie**" is a small amount of information that a web server sends to your browser that stores information about your account, your preferences, and your use of the Services. Some cookies contain serial numbers that allow us to connect your activity with the Services with other information we store about you in your profile.

Some cookies are temporary, whereas others may be configured to last longer. "**Session**" cookies are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases Session cookies once you exit your browser. "**Persistent**" cookies are more permanent cookies that are stored on your computers or mobile devices even beyond when you exit your browser. We use Persistent cookies for a number of purposes, such as retrieving certain information you have previously provided (such as your user id if you asked to be remembered), and storing your preferences.

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions. When you access these pages or open email messages, the pixel tags and web beacons generate a notice of that action to us, or our service



providers. These tools allow us to measure response to our communications and improve our web pages and promotions.

We collect many different types of information from cookies and other technologies. For example, we may collect information from the devices you use to access our Services, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Browsers routinely send these types of information to web servers. Our server logs also record the IP addresses of the devices you use to interact with the Services. We may also collect information about the website you were visiting before you came to our Services and the website you visit after you leave our Services, if this information is supplied to us by your browser.

In many cases, the information we collect using cookies and other tools is used in non-identifiable ways, without any reference to Personal Information. For example, we use information we collect about users to optimize our Services and understand its traffic and usage patterns. In other cases, we associate the information we collect using cookies and related technologies with Personal Information. In that case, this Privacy Policy governs how we use that information.

Additionally, if you have visited one of our mobile websites or activated one of our mobile-device applications, and if the settings on your location-aware device allow us to receive Location Information, we will collect that automatically. If we associate Location Information with other Personal Information, this Privacy Policy governs how we would use that information too.

We may allow third parties to use tracking devices through the Services to collect the same type of information for the same purposes as Giverly does for itself. For example, Giverly has relationships with third party advertising technology and analytics companies, such as Google Analytics, BlueKai, and Adometry, to perform tracking and reporting functions for our Services and, in some cases, to help us place targeted advertisements via the Services or third-party websites. Additionally, we may share non-personally identifiable information from or about you with third parties, such as location data, advertising identifiers, or a cryptographic hash of a common account identifier (such as an email address), to facilitate the display of targeted advertising. Third parties may be able to associate the information they collect with other information they have about you from other sources. We do not necessarily have access to or control over the tracking devices they use.

7. Accessing and Correcting Personal Information

Keeping Personal Information about you current helps ensure that we offer you the best coupons available for merchants and business partners. You can do several things to help keep Personal Information about you current. You can access, update and delete your Contact Information and the other information you provided us to use in your profile by logging into the Services via a desktop computer and clicking on the "Profile" link.

If you want to close your account or have other questions or requests, or if you would like to access or request a correction to any other Personal Information we hold regarding you, please [Contact Us](#).



We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, [Contact Us](#). In response, we will cancel or remove your information but may retain and use copies of your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

8. Security of Personal Information

Giverly follows generally accepted industry standards to protect the Personal Information that you provide. For example, we regularly monitor our system for possible vulnerabilities and attacks, and we use a secured-access data center. No method of transmission over the Internet, or method of electronic storage, is one hundred percent secure, however. For this reason, there is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you have any questions about our security practices, please [Contact Us](#).

9. Notice to Residents of Countries outside the United States of America

Giverly is headquartered in the United States of America. Personal Information may be accessed by us or transferred to us in the United States or to our affiliates, business partners, merchants, or service providers elsewhere in the world. By providing us with Personal Information, you consent to such access and transfers. You also acknowledge and agree that Personal Information may be subject to access requests from governments, courts, law enforcement officials, and national security authorities in the United States in accordance with United States laws. We will protect the privacy and security of Personal Information according to our Privacy Policy, regardless of where it is processed or stored.

To ensure adequate protection of personal data of the European Economic Area (the "EEA"), any transfers of such data outside of the EEA will be pursuant to the Model Clauses approved by the European Commission. Giverly commits to resolve complaints about your privacy and our collection or use of your personal information. We encourage anyone with inquiries or complaints regarding this privacy policy should first [Contact Us](#).

10. Privacy Practices of Third Parties

This Privacy Policy only addresses the use and disclosure of information by Giverly through your interaction with the Services. Other websites that may be accessible through links from our Services may have their own privacy statements and personal information collection, use, and disclosure practices. Merchants and business partners may have their own privacy statements, too. We encourage you to familiarize yourself with the privacy statements provided by these other parties prior to providing them with information or taking advantage of an offer or promotion.

11. Communities

Our Services contain Communities and other areas where you may be able to publicly post information, communicate with others (such as via discussion boards or blogs), review coupons, products and merchants, and submit media content. Prior to posting in these areas, please read our [Terms of Use](#) carefully. All the information you post will be accessible to anyone with Internet access, and any Personal Information you include in your posting may be read, collected, and used by others in a manner we cannot control. For example, if you post your email address along with a comment explaining how to



redeem a particular coupon, you may receive unsolicited messages from other parties. We are not able to control the use by third parties of Personal Information you post to public areas of the Services. Please avoid publicly posting Personal Information. If you have questions about Personal Information that you have publicly posted in our Communities, please [Contact Us](#).

12. Changes to this Privacy Policy

From time to time, we may update this Privacy Policy to clarify our practices or to reflect new or different privacy practices, such as when we add new features to our Services. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of notice on the Services prior to the change becoming effective. Your continued access or use of the Services after any such changes become effective constitutes your acceptance of the Privacy Policy as revised. We encourage you to periodically review this page for the latest information about our privacy practices.

13. Children's Privacy

Giverly does not intend that any portion of the Services will be accessed or used by children under the age of thirteen, and such use is prohibited. By using the Services, you represent that you are at least thirteen years old and understand that you must be at least thirteen years old in order to create an account and purchase the goods or services advertised through the Services. We will promptly delete information associated with any account for which we obtain actual knowledge that the registered user associated with the account is not at least thirteen years old.

14. California Privacy Rights

Pursuant to Section 1798.83 of the California Civil Code, residents of California can obtain certain information about the types of Personal Information that companies with whom they have an established business relationship have shared with third parties for direct marketing purposes during the preceding calendar year. In particular, the law provides that companies must inform consumers about the categories of Personal Information that have been shared with third parties, the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. To request a copy of the information disclosure provided by Giverly pursuant to Section 1798.83 of the California Civil Code, please [Contact Us](#), or write us at the following address:

Giverly International, Inc.
Attention: Legal Department
16 E. Ave. A, Suite 211
Temple, Texas 76501

Please allow 30 days for a response.