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SIMI Privacy Policy

BLUWALK, LDA. ("SIMI") knows that you take your privacy seriously. We do, too. We are committed to giving you transparency of our privacy practices and control over your data in connection with SIMI's Service (as defined in SIMI's Terms of Use). We have developed this document to describe the data we collect, how we use it, with whom we share it, and your choices regarding your data.

This Privacy Policy covers SIMI's treatment of personally identifiable information ("Personal Information") and other data that SIMI gathers when you are accessing SIMI's Service. The Service is not available to individuals who are younger than 13 years old.

Personal Information collected

- **Personal Information You Provide to Us:** We receive and store any information you enter on our Service or provide to us in any other way. The types of Personal Information collected may include your name, email address, phone number, birthday, Google and/or Facebook usernames, use information regarding your use of our Service, and browser information. We automatically receive your location when you use the Service. The Personal Information you provide is used for such purposes as allowing you to set up a user account and profile that can be used to interact with other users through the Service, improving the content of the Service, customizing the advertising and content you and your friends see, and communicating with you about specials and new features. We may also draw upon this Personal Information in order to adapt the Services of our community to your needs, to research the effectiveness of our network and Services, and to develop new tools for the community.
- **Information Collected Automatically:** When you use the Service, SIMI automatically receives and records information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested. We treat this data as non-Personal Information, except where we are required to do otherwise under applicable law. Unless otherwise stated in this Privacy Policy, SIMI only uses this data in aggregate form. We may provide aggregate information to our partners about how our users, collectively, use our Service, so that our partners may also understand how often people use their services and our Service.
- **Information We Receive from Third Parties:** We receive and store information from third parties that interact in some way with the Service or that provide services to us in connection with the Service.

Determining and Sharing Location

SIMI deals with location, so in order to work, SIMI needs to know your location. Whenever you open and use/interact with the SIMI app on your mobile device or go to getsimi.com, we use the location information from your mobile device or browser (e.g., latitude and longitude) to tailor the SIMI experience to your current location (i.e., we'll show you a list of nearby locations, friends and tips). This information is NOT shared with others. Your location data is ONLY shared with others when you proactively decide to "check in" to tell SIMI you're at a particular place. The location information shared with a "check in" is the location information of that place. Each of your SIMI check-ins is saved to your "Check-in History," which allows you to look back at all the locations you have checked in since you created your SIMI account. You can delete any or all of your check-ins from the check-in details page on the SIMI website and SIMI app. If for some reason you ever decide to delete your SIMI account, your entire check-in history will be removed from our database.

What About Cookies and Similar Technologies?

Cookies are small pieces of data that are stored on your computer, mobile phone or other device. Pixels are small blocks of code on webpages and in emails that do things like allow another server to measure viewing of a webpage and often are used in connection with cookies.

We and our agents use technologies like cookies, pixels, and local storage (like on your browser or device, which is similar to a cookie but holds more information) on our website, in our emails, and identifiers supplied by app platform companies within our apps to provide you with a range of products and services. By continuing to use our Service through your computer or mobile device, you consent to our use of cookies, pixels and local storage.

We and our agents use these technologies to do things like:

- Make SIMI easier or faster to use;
- Enable features and store information about you (including on your device or in your browser cache) and your use of SIMI;
- Deliver, understand and improve advertising to SIMI users on behalf of SIMI and others (such as for entities that have SIMI sponsored or promoted products) on the SIMI app, getsimi.com and on other websites that you visit, based on your activity on getsimi.com;
- Monitor and understand the use of our products and services; and
- To protect you, others and SIMI.

We sometimes use other service providers to help us provide certain products and services and to provide us information about use of the Service to improve the Service and make it appealing to as many users as possible. For example, SIMI uses third party analytics providers, like Google Analytics, to better understand who is using the service and how people are using it. As part of providing these services, these service providers may collect and store anonymous information such as time of visit, pages visited, time spent on each page of the website, IP address, and type of operating system used.

Most web browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. Also, Google has developed a web browser plugin to allow you to opt-out of Google Analytics' tracking software.

Email Communications

If you do not want to receive commercial email or other mail from us, please indicate your preference by making a modification on your user profile settings page on our website once you're logged into the service. Please note that if you do not want to receive legal notices from us, such as notices regarding this Privacy Policy, those legal notices will still govern your use of the SIMI Service, and you are responsible for reviewing such legal notices for changes. We may receive a confirmation when you open an email from SIMI if your computer supports this type of program. SIMI uses this confirmation to help us make emails more interesting and helpful and improve our service.

How is My Information Shared?

Personal Information about our users is an integral part of our business. We neither rent nor sell your Personal Information to anyone, though, as described more fully in this section below (under "Publicly Available Information, the SIMI API, and Apps"), your publicly-available information is available to third parties, and we may provide it to third parties, by license or otherwise. The default user settings for all

data about you that is visible to others is summarized in our Help Center, together with information on how to change the default user settings or how to generally remove information, where applicable. SIMI may share your Personal Information only as described in this Privacy Policy and related documents.

- **Businesses, Locations, Events and Brands:** One of the key purposes of SIMI is to help users learn about businesses, locations and brands that are relevant to them, and for these entities to provide information about themselves and their locations to users. Additionally, brands may have access to aggregated and anonymous data, such as anonymized check-in data (that is, not tied to individual users) of users that like their brand.
- **Publicly Available Information, the SIMI API, and Apps:** When you use SIMI, certain information is public, such as your public user profile information, tips, likes, public photos, lists that you create and lists of friends, and may be searchable by search engines and be shared with or disclosed to third parties, including through our API to a wide range of users and services. We may also share or disclose aggregated and anonymous data, such as anonymized check-in data (that is, not tied to individual users), to third parties, including users of our API, for analytical or other purposes.

In addition, use of third party apps developed using our API are subject to the terms of use and privacy policies of such third party developers. Certain Personal Information may be made available to third party developers if you or your "friends" use these third party apps. You should review the policies of third party apps and websites to ensure that you are comfortable with the ways in which they use and disclose the information you share with them. We do not guarantee that they will follow our rules or our Privacy Policy. Note that your friends will also be able to see which third party apps that you use.

- **Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Our agents do not have any right to use Personal Information we share with them beyond what is necessary to assist us, and they provide a comparable level of protection for your Personal Information.

SIMI Features

The SIMI service includes several features that may allow you to share your information with others. For each of these and our other features, the information available to friends and others, our default user settings, and how to alter the default settings, is available in the Help Center. Please review them carefully. Please remember that if you choose to provide personal information using certain features of the Service, that information may be available to the wider SIMI community, or may be published on the SIMI website, which is subject to indexing by third party search engines.

Sharing with Partners, in connection with business transfers, and for the protection of SIMI and others

- **Our Partners:** In addition to the data sharing described above, we enter into relationships with a variety of businesses and work closely with them. In certain situations, these businesses, provide services to you, sell items or provide promotions to you through SIMI's Service. In other situations, SIMI provides services, or sells products jointly with these businesses. You can easily recognize when one of these businesses is associated with your transaction, and we will share your Personal Information that is related to such transactions with that business.
- **Business Transfers:** If Foursquare or substantially all of its assets are acquired, or in the unlikely event that SIMI goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party.

- **Protection of SIMI and Others:** We may release Personal Information when we believe in good faith that release is necessary to comply with the law, including laws outside your country of residence; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of SIMI, our employees, our users, or others. This includes exchanging information with other companies and organizations (including outside of your country of residence) for fraud protection and credit risk reduction.

What Personal Information Can I Access?

SIMI allows you to access the following information about you for the purpose of viewing, and in certain situations, updating that information and ensuring that it is accurate and complete. You can access this information on the SIMI website by visiting the user profile settings. This list will change as our Service changes.

- Password
- Email address
- Other User profile information (for example, home city, photo)
- Usage information (for example, check-in history)

If you have questions about the Personal Information we have collected from you, you can email privacy@getsimi.com.

How Do I Delete My Account?

Should you ever decide to delete your SIMI account, you may do so by clicking on the "delete account" link on your account settings page. If you terminate your account, your profile, including your check-in history, badges you received, your User Submissions (as defined in SIMI's Terms of Service) and any promotional offers you received, will be removed from the site and deleted from SIMI's servers. Because of the way we maintain Foursquare, such deletion may not be immediate, and residual copies of your profile information or posts may remain on backup media for up to ninety (90) days.

How Is Information Removed From My Account?

Even after you remove information from your account or profile, copies of that information may remain viewable elsewhere, to the extent it has been shared with others, it was otherwise distributed pursuant to your privacy settings, or it was copied or stored by other users. Removed and deleted information may remain on backup media for up to ninety (90) days prior to being deleted from our servers.

Will There Be Changes To This Privacy Policy?

SIMI may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make material changes in the way we use Personal Information, we will notify you by posting an announcement on our Service or sending you an email. Users are bound by any changes to the Privacy Policy when they use the Service after such changes have been first posted.

What If I Have Questions Or Concerns?

If you have any questions or concerns regarding privacy using the Service, please send a detailed message to: privacy@getsimi.com. We will make every effort to resolve your concerns.