

### **PRIVACY POLICY**

This Privacy Policy of Whyline, Inc. (hereinafter referred as "Whyline", "we", "us", "our") applies to the operations of Whyline that we offer through our web site, social netwoks, and our mobile software application without regard of the the electronic device applied for any such access, including any other Services referred in this Policy (collectively the "Services").

Any person that accesses, searches or uses, in any manner, the Service, weather by automated means or not, will be consider as a User ("you", "your", or the "User"). This Privacy Policy sets forth the terms and conditions for collecting, using, and disclosing the information, including Personal Data as defined below, of each User of the Service. In this Policy, when we mention "information" we refer to information in general terms that may include Personal Data.

We recognize that you choose to use the Service and your privacy is important to you and us. So we will protect the information you share with us. We appreciate your trust in our capacity to maintaining the security of your personal information, and we want you to know what information we collect and the purpose of such collection. To protect your privacy, Whyline follows different principles in accordance with worldwide practices addressing appropriate protection of privacy and personal information. Whyline complies with all data protection regulations of those jurisdictions where Whyline operates.

Throughout this Privacy Policy, we make reference to your personal data ("Personal Data") Personal Data that registered Users provide. This includes information about you, such that your identity can be reasonably ascertained. Information including, but not limited to; name, age, email addressPersonal Data.

By using the Service, you accept the terms, conditions and practices set forth in this Privacy Policy. Please read it carefully before using the Service. If you do not agree to the terms and conditions of this Privacy Policy, you may not access or otherwise use the Service.

### REGISTRATION

Should you request an account with the Service, Whyline requires that you submit a First and Last Name, Telephone Number, Email Address and, depending on your use of the Service, Street Address, City, State, Zip Code and other optional information. Whyline requires this information to create and manage new accounts. Whyline Account Holders must create a password to access certain features within the Service.

## CONSENT & ACCESS. USE OF PERSONAL DATA. PURPOSE OF PROCESSING.

The Personal Data that Whyline collects and processes may include:

- Basic information, such as first and last name, age, gender, identification number or driver license number and, depending
  on your use of the Service, city, state, zip code.
- Contact information, such as email address and phone number(s).
- Internet and other technical information, such as information from your visits to our site or applications or in relation to materials and communications we send to you electronically.

Whyline will only use your Personal Data to provide our Services and to fulfil of our legal or regulatory obligations. These permitted uses may include:

- To provide our Services to you;
- To manage and administer our relationship with you;
- To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims;
- To communicate with you;
- To provide information that you may request;

- To provide and improve our Services and site, including auditing and monitoring its use;
- For statistical purposes;
- Distributing surveys or marketing materials; and/or
- For other legitimate business purposes.

Whyline will regularly collect your Personal Data when you register in order to access the Services.

If you choose not to register or provide Personal Data, you can still use the public information on Whyline website but you will not be able to access areas that require registration.

If you decide to register, you will be able to select the kinds of information you want to receive from us by subscribing to various services such as, but not limited to, electronic newsletters. If you do not want us to communicate with you about offers regarding Whyline products, programs, events, and services by email, postal mail, or telephone, you may select the option stating that you do not wish to receive marketing messages from Whyline. If you opt out, we may still send you non-promotional emails, such as emails about your account with Whyline or our ongoing business relations.

Whyline occasionally allows other companies to offer our registered Users information regarding their products and services. If you do not want to receive these offers, you may select the option stating that you do not wish to receive marketing materials from third parties.

Whyline may also share your Personal Data with third parties for statistical purposes.

We receive and store information you provide when you use the Service. For example, we collect information when you: provide information to sign up for an account with the Service; provide information in your Account Profile; login and operate your account within the Service; or communicate with us by email for any purpose.

You may also provide us other information through your within the Service and correspondence through our Service. You can choose not to provide certain information, but you may not be able to use all of the Service features as a result.

We also collect general, statistical, Non-Personally identifiable Information ("Non-Personal Data") including, but not limited to, technical information about your device, system and application software.

#### INFORMATION WE COLLECT FROM THIRD PARTIES

We may also obtain information about you from third parties if you choose to provide us with access to certain Personal Data stored by third parties such as social media sites (such as Facebook and Twitter). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorization. By associating an account managed by a third party with your Whyline account and authorizing Whyline to have access to this information, you agree that Whyline may collect, store and use this information in accordance with this Privacy Policy.

# **OPERATIONAL ACTIVITY DATA COLLECTION**

Whyline may track and record any of your activity and/or use of the Service. This includes, but not limited to, your use of Whyline in looking for a venue's level of congestion and approximate wait time, and getting in line. The information collected may also include your location and other information you have provided access to on your mobile device or tablet while you are using the app or on your computer while you are using the web-based version,

## **SECURITY**

Whyline has taken appropriate measures to protect the security of your Personal Data and to ensure that your choices for its intended use are honored. We take precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction. We do not retain Personal Data unless the same is necessary to comply with the Service.

We make efforts to guarantee your e-commerce transactions are safe and secure. When you place orders or access your Personal Data, you are utilizing secure server software SSL, which encrypts your Personal Data before it's sent over to the Internet.

In addition, your transactions are guaranteed under the Fair Credit Billing Act. This Act states that your bank cannot hold you liable for more than \$50.00 in fraudulent credit card charges. If your bank does hold you liable for \$50.00 or less, we'll cover your liability provided the unauthorized, fraudulent use of your credit card resulted through no fault of your own and from purchases made from us over our secure server. In the event of unauthorized use of your credit card, you must notify your credit card provider in accordance with its reporting rules and procedures.

Your Personal Data is never shared outside the company without your permission, except under conditions explained in this document.

Whyline will not publish any of your operational or profile data in any personally identifiable way. We DO NOT sell your Personal Data to third parties or mass marketers. Unless you consent to the disclosure of your Personal Data, only Whyline and our affiliates, technical consultants, third-party administrators and other specifically permitted third-parties who enhance the functionality of the Service or who provide associated services, such as venues who make our Service available to you through their individual websites or apps or who have loyalty programs covering multiple brands, have access to this information. For example, we may work with agents to analyze data, operate promotions, provide marketing assistance, and/or provide customer service. These agents may have access to select portions of Personal Data needed to perform their functions, but they may not use it for other purposes.

We use the Personal Data that you provide to us in order to operate the Service, improve our Service, and communicate with you. We may send periodic product updates as well as Service-Account updates that may include, but are not limited to, notices required by law and/or notices of a change in this Privacy Policy.

If you provide us with your email address, we reserve the right to send you marketing and promotional emails. You may opt out of receiving such communications from the Service by following the instructions included with those emails. You may also send requests about contact preferences or changes to Personal Data. We use Non-Personal Data (anonymized data) in the aggregate to compile data trends, and otherwise analyze the performance of our Service. Non-Personal Data will also facilitate the provision of software updates, product support, and other services to you. This aggregate data will in no way personally identify you or any other Users of the Service.

## **PAYMENTS**

Payment information provided through the Service is never placed on Whyline servers. All payment related information is processed via a third party vendor, which maintains the highest level of security in order to process payments. Whyline operates in compliance with PCI standards. While you may provide financial information such as credit card or bank account numbers in connection with a transaction while using the Service, Whyline does not actually receive, even temporarily, any of that financial information and it is all collected by the third-party service directly.

### LIABILITY

Notwithstanding any steps taken by us, it is not possible to guarantee the security and integrity of all data transmitted over the Internet. While we take reasonable steps to protect your Personal Data, we cannot and do not warrant the security or integrity of any information you transmit to us when registering for our Service or otherwise. All such transmission of information is at your own risk. You also have a significant role in protecting you information. No one can see or edit your Personal Data without knowing your User name, password and Personal Data, so do not share these with others.

## PUBLICLY SUBMITTED INFORMATION

While using the Service, you may have opportunities to post information in public forums. Be advised that any information you personally submit, whether Personal Data or Non-Personal Data, is made public and is not subject to this Privacy Policy. We are not responsible for any third party's use of Personal Data that you may publicly disclose through the Service.

# **DISCLOSURE OF YOUR INFORMATION**

We reserve the right to release account information and other Personal Data: when we believe release is appropriate to comply with the law; at the request of any judicial, administrative or similar proceeding such as a subpoena; to investigate suspected fraud, harassment, physical threats, or other violations of any law, rule or regulation; to protect the rights, property, or safety of the Service, our Users, or others; or to enforce or apply our Terms of Use and other agreements.

### COOKIES

Like many web sites, the Service may transfer cookies to your computer's hard drive. Cookies are alphanumeric identifiers that function with your web browser and that enable our systems to recognize it and improve your use of the Service. For example, cookies may enable us to recognize your specific browser and offer you a personalized greeting when you use the Service or to inform us of what browser you are using. The Help function on most browsers will tell you how to prevent your browser from accepting new cookies, display a notification that your browser is receiving new cookies, erase cookies, or disable cookies altogether. We recommend that you permit cookies from our Service because in many instances cookies allow you to make use of many of the Service features.

By using Whyline servies and site, you agree that we can place cookies on your device. If you want to restrict or block any of the above cookies, you should do this through the web browser settings for each browser you use and on each device you use to access the internet. Please be aware that some of areas of our site may not function if your web browser does not accept cookies. However, you can allow cookies from specific sites by making them "trusted sites" in your web browser.

### **LINKS TO OTHER SITES**

The Service may provide links that direct you away from the Service to outside websites. To the extent that occurs, those third-party websites are not operated by us and are beyond our control. These websites may independently collect data, or solicit Personal Data. When visiting these websites, you are subject to their privacy policies, and we encourage you to read them as well as any terms of use or service. We are not responsible for the privacy practices of these other websites and we cannot guarantee the security of any of your Personal Data collected there.

### **BUSINESS PRACTICES AND CHANGE OF CONTROL**

As our business evolves and our practices change, we will continue to update this Privacy Policy. We will periodically notify Users of changes in our policies and you should check our Service frequently for any changes. Changes made in updated privacy policy are deemed merged with existing policy. Your continued use of the Service is considered assent to any such changes. Additionally, as our business continues to grow, we may acquire or sell a business. We reserve the right to transfer customer information in connection with such a transaction, but such information remains subject to the provisions of any pre-existing Privacy Policy. In the event that Whyline or substantially all of its assets are acquired, customer information may be one of the transferred assets.

## TRANSFERS OF PERSONAL DATA. RULES OF PROCESSING.

In order to provide our Services, we may need to transfer your Personal Data to locations outside the jurisdiction where you provided such information or different from the country of jurisdiction where the Services are performed or where you are viewing our website or otherwise accessing th Service. This may entail a transfer of your Personal Data from a location within the European Economic Area (the "EEA") to outside the EEA, or from outside the EEA to a location within the EEA. It may also entail the transfer from a country with adequate level of protection for Personal Data to a country or jurisdiction without laws or regulations that specifically protect Personal Data.

The level of protection of Personal Data in countries outside the EEA or different from those formally recognized by the European Commission as countries with adequate protection, may be less than that offered within the EEA or those recognized countries. Where this is the case, we will implement appropriate measures to ensure that your Personal Data remains protected and secure in accordance with applicable data protection laws.

Whyline implements appropriate technical and organizational measures to help protect your Personal Data from unauthorized access, use, disclosure, alteration or destruction consistent with applicable data protection laws. Personal Data may be stored on our own technology systems or those of our vendors or in paper files.

Whyline will delete your Personal Data when it is no longer reasonably required or necessary for the permitted uses described in this document or if you withdraw consent to processing (where applicable).

#### **RIGHT OF ACCESS.**

You are entitled to request details of your Personal Data retained by Whyline and the manner in which the same is processed. You may also have a right in accordance with applicable data protection law, to have it rectified or deleted, to restrict our processing of that information, to stop unauthorized transfers of your Personal Data to a third party and, in some

circumstances, to have your Personal Data transferred to another organization. You can also lodge a complaint with the supervisory or competent authority in those cases in which the General Data Protection Regulation of the European Union or other local regulation applies to protect your rights in regard to your own Personal Data. At the end of this document, you will find Whyline contact information in case you need any clarification.

### **CHILDREN**

Individuals of age 13-17 may use the Service, but they may do so only under the supervision of a parent or legal guardian, and subject to our Terms of Use. As per these Terms, persons under the age of 13 are not permitted to access the Service. We do not intentionally seek to sell anything to, influence, collect information from or otherwise address individuals 13 years of age and younger, nor do we knowingly collect Personal Data from children under 13 through the Service.

### **NOTICE TO PARENTS**

Parents or guardians: we want to help you guard your children's privacy. We encourage you to talk to your children about safe and responsible use of their Personal Data while using the Internet.

Whyline does not publish content that is targeted to children.

#### **ENFORCEMENT**

If for some reason you believe Whyline has not adhered to these principles, please notify us by (email), and we will do our best to determine and the correct the problem promptly. Be certain the words 'Privacy Policy' are in the subject line.

### **CONTACT INFORMATION**

Whyline 134 North 4th St, 2nd floor Brooklyn, NY 11249

Email: info@whyline.com

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THESE TERMS ARE EFFECTIVE AS OF September 1st, 2018

