

Privacy Policy

This is the privacy policy ("**Privacy Policy**") that governs how we, TripLights Solutions Ltd. ("TripLights", "**we**", "**our**" or "**us**"), use Personal Information (defined below) that we collect, receive and store about individuals in connection with the use of the TripLights mobile software application (the "**App**").

1. **Introduction.** We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the App. "**Personal Information**" means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information.
2. **Terms of Use.** This Privacy Policy forms part of our End User License Agreement ("**EULA**") which can be viewed from within the App. Any capitalized but undefined term in this Privacy Policy shall have the meaning given to in the EULA.
3. **Consent and Modification.** By using the App, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the App. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the App, and your continued use of the App thereafter means that you accept those changes.
4. **What Personal Information We Collect and How We Collect It.** We do not currently require you to provide Personal Information in order to have access to general information available on the App. But, we do receive and/or collect Personal Information from you in the following ways:
 - 4.1. **Account.** In order to provide you with certain services that we offer via the App, you may be required to create an account ("**Account**"). We may offer different options to create an Account, including:
 - (a) **Online Registration Form:** You may choose to complete and submit an online registration form. You will be asked to provide us with certain mandatory information such as your name and email address, and also a password that you will use for your Account. You may choose to provide optional information such as your age and gender.
 - (b) **Facebook, Twitter and other Third Party Accounts:** You may choose to create an Account by clicking on a connect button that we may display on the App for Facebook, Twitter or another designated third party website or service (each a "**Third Party Account**"). Doing so will enable you to link your App Account and your Third Party Account. If you choose this option, then you will be referred to the Third Party Account so that you can approve the connection as well as the types of information that we will obtain from, and the types of activities that we may perform in connection with, your Third Party Account. Such information may include your Third Party Account user name, email address, profile picture, birthday, gender and preferences. Please note that in order to use this option, you will need to have, and may need to be signed-in to, an existing Third Party Account.

Regardless of which method you choose to register your Account, we may send an email to your nominated email address to instruct you how to confirm your registration.
 - 4.2. **'Contact Us' Information.** If you send us a feedback form or a "Contact Us" request, whether by submitting an online form that we make available on the App or by sending an email to an email address that we display on the App, you may be required to provide us with certain information such as your name and email address.
 - 4.3. **Profile.** Some parts of the App may enable you to build a public profile in connection with your Account ("**Public Profile**"). Your Public Profile will include your name, and other information that you choose to include in your Public Profile, such as your age, gender and a profile picture.
 - 4.4. **Share with Friends Service.** The App may enable you to invite your friends to use the App by sending them an invitation email or message. You may do so by: (i) using the App to send or post an invitation message via your Third Party Account; and/or (ii) using the App to send an invitation email to your friend's external email address (for example, a gmail address). If you send or post an invitation

message we may collect Personal Information about the recipient such as their email address or their party website account user name and id.

- 4.5. **Location Data.** We may provide certain location-based services ("**Location Services**") in connection with the App that are dependent on data related to the geographic location of your mobile device on which the App is installed ("**Location Data**"). If you choose to participate in these Location Services, you agree that we may collect or obtain your Location Data. You should be able to use the settings on your mobile device to turn off location-sharing features.
- 4.6. **Log Files.** We may make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the App, track user's movement around the App, and gather demographic information.
- 4.7. **Mobile Device Data.** We may collect limited information from your mobile device in order to provide the App. Such information may include your mobile device type, mobile device id, and date and time stamps of App use. In addition, we may deploy tracking technologies within the App to help us gather aggregate statistics, but we will not use Personal Information for such purposes.
5. **Publicly Available Information.** Your Public Profile and any publicly available content that you post on or via the App ("**User Submissions**") may be publicly available to other App users, and may also be accessed and used by people off the App. The notices and tools that we provide on the App should help inform you which information will be made publicly available. If you publish your contact information in any User Submissions or as part of your Public Profile, you may receive unsolicited messages from App users or the public. We therefore encourage you to only post information that you are sure you want to be accessible to anyone.
6. **The Way We Use Personal Information.** If you submit or we collect Personal Information through the App, then such Personal Information may be used by us in the following ways:
 - 6.1. We will use your Personal Information to provide and improve our App, to contact you in connection with the App and certain programs or offerings that you may have registered for, and to identify and authenticate your access to the parts of the App that you are authorized to access.
 - 6.2. We may use your designated email address to: (i) send you updates or news regarding the App and our products and the products of our partners and other third parties; and/or (ii) respond to a "Contact Us" or administrative request (for example, to change your password).
 - 6.3. If you choose to send your friend an invitation email or message we will use the contact information that you provide, or make available, to automatically send your friend an email or message inviting them to join your Group. Your name or email address may be included in the invitation email or message.
 - 6.4. We may transfer your Personal Information to our subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries around the world. We require that these parties agree to process such information in compliance with our Privacy Policy.
 - 6.5. We may share your Personal Information with our third party service providers and partners, but only to assist us with our business operations and to provide the App. Such information may be transferred to other countries around the world. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Information.
 - 6.6. We may disclose your Personal Information or any information you submitted via the App if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our EULA, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of TripLights, our users, yourself or the public.
7. **Use of Anonymous Information.** We may collect and use Anonymous Information (as defined below) or disclose it to third party service providers in order to improve our App and enhance your experience with the App. We may also disclose Anonymous Information (with or without compensation) to third parties, including advertisers and partners. "**Anonymous Information**" means

information which does not enable identification of an individual user, such as aggregated information about the use of our App.

8. **Opting Out.** You may choose not to receive future promotional, advertising, or other App-related emails from us by selecting an unsubscribe link at the bottom of such emails that you receive from us. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact Us" request as well as administrative emails that are necessary to facilitate your use of the App.
9. **Choice.** At all times, you may choose whether or not to provide or disclose Personal Information. If you choose not to provide mandatory Personal Information, you may still visit parts of the App but you may be unable to access certain options, programs, offers, and services that involve our interaction with you.
10. **Access/Accuracy.** To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any of your Personal Information that we may be storing, you may submit an access request by sending an email to feedback@triplights.com. Your email should include adequate details of your request.
11. **Links to and Interaction with Third Party Products.** The App may enable you to interact with or contain links to your Third Party Account and other third party websites, products and services that are not owned or controlled by us (each a "Third Party Provider"). We are not responsible for the privacy practices or the content of these Third Party Providers. Please be aware that the Third Party Provider may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Provider that you choose to use or interact with.
12. **Children's Privacy.** The App is not structured to attract children under the age of 13 years. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 13 years. If we learn that we have collected Personal Information from a child under 13 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at feedback@triplights.com.
13. **Security.** The security of Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the App, you can contact us at feedback@triplights.com.
14. **Merger, Sale or Bankruptcy.** In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events.
15. **California Privacy Rights.** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to feedback@triplights.com. Please note that we are only required to respond to one request per customer each year.
16. **Our California Do Not Track Notice.** We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the App.
17. **Commitment.** We are committed to protecting your privacy. Protecting your privacy online is an evolving area, and we are constantly evolving our App to meet these demands. If you have any comments or questions regarding our Privacy Policy, or your Personal Information that we may be storing and using, please contact us at feedback@triplights.com.

Last updated: 1 June 2014