

# Privacy Policy

Last modified: August 2019

We at Vevro have created this Privacy Policy to describe how information is collected, used, and disclosed when you visit or use an Vevro Offering. By accessing and/or using this Vevro's website or any Vevro Offering, you are accepting the practices and terms described in this Privacy Policy.

The term "Vevro" means Vevro (Private) Limited and its Affiliates. The term "Affiliate" means, with respect to any party, any person or entity which controls, is controlled by, or is under common control with, such party.

The term "Vevro Offering" means the websites of Vevro, including [www.vevro.com](http://www.vevro.com) and [www.vevrodigital.com](http://www.vevrodigital.com), any other sites on which this Privacy Policy is posted, and any other Vevro application, service or product licensed, downloaded or otherwise accessed by you through third party sites or sources, including the products and services available through any of the foregoing.

## INFORMATION THAT WE MAY COLLECT

### Personally Identifiable Information:

We may collect, among others, the following information when you sign up with an Vevro Offering: first name, last name, date of birth, email address, mailing address, phone number, credit or debit card information or other payment details, depending on your form of payment.

### Technical Information:

When a user accesses an Vevro Offering, we may collect technical information about the user's device, such as the IP address that requested the display of the Vevro Offering, the operating system type, and the identifiers associated with the device.

### Sign Up and Survey information:

Any information you provide to us, and any information you choose to share about yourself as part of your use of any Vevro Offering, may be stored as entered.

### Cookies and Web beacons:

Cookies are text files that we and our service providers may place on your device's browser to enable our systems to recognise your browser and to provide features such as storage of items in your shopping cart between visits, personalised Vevro advertisements on third party websites and mobile applications, and personalised third party advertisements within certain Vevro Offerings. We may use sessions, Web cookies and Adobe Flash cookies to remember your settings, preferences and usage within an Vevro Offering. Web beacons, are small pieces of code that we and our service providers may place on an Vevro Offering to monitor and collect data about visitor behaviour within the Vevro Offering.

We may receive a confirmation when you open email from Vevro, if your computer supports such capabilities. We may also track other types of information, such as what demos that the users download and install, any download errors, how long our users have been participating in any Vevro Offerings, the last time a user accessed an Vevro Offering, user behaviour and other Vevro Offerings analytics.

#### Social Networking Sites:

If you access an Vevro Offering via a third party social networking site, Vevro may receive information about your social networking site profile, including without limitation the information you make publicly available, your social networking site user ID, your first, last and user names, profile and cover photos.

#### Mobile:

When you download or access Vevro Offerings via a mobile device, we and our service providers may receive information about your location (based on your IP address) and your mobile device, including various unique identifiers associated with your device, hardware type, the version of your operating system and your activity within games. We and our service providers may use this information to provide you with personalised advertising and other content, including advertising and content based on your location.

#### Aggregated, Anonymous Information:

We may collect aggregated, anonymised information via Vevro Offerings that does not identify any single user or device. If you choose to provide a username within an Vevro Offering, please do not provide as your username any information that identifies you in real life, such as your real name.

#### USE AND SECURITY OF COLLECTED INFORMATION

We may use your username, email address, and password to uniquely identify you as a user on an Vevro Offering, to provide you with services and to process transactions. We may use or display your username and icon or profile photo, if applicable, for the purposes of rankings, competitions or sweepstakes, chat identification, and/or game high scores. We may use your date of birth to confirm your eligibility to participate in Vevro Offerings.

Subject to the terms of this Privacy Policy, we may use your contact information to process our promotional newsletters and/or email campaigns and to send you updates, security alerts, or administrative messages relating to Vevro Offerings. Your contact information will allow us to notify you about new features, enhancements, resolution of Vevro Offerings problems, handle and/or route your customer support questions and issues, and inform you of upgrade opportunities, sweepstakes, contests, prizes, and/or special events. If our "Tell a friend" feature is available within a particular Vevro Offering and you choose to participate in it, your email will be shared with the person to whom you send the Vevro Offering using this feature. We may use an IP address to surface the appropriate country-based version of a Vevro Offering to a user, or to exercise our ability to restrict access to the site by users who have violated our Terms of Use.

We and our third party service providers use cookies and other technologies, such as mobile device identifiers, to enhance your experience with Vevro Offerings. These technologies enable us and our service providers to run our affiliate programs and provide you with customised content or offerings, such as personalised Vevro advertisements on other websites and mobile applications and personalised third party advertisements within certain Vevro Offerings. Cookies also enable you to automatically sign in when you access an Vevro Offering, and offer other operational activities within an Vevro Offering. We and our third party service providers may also use cookies and other technologies to manage and measure the performance of third party advertisements within certain Vevro Offerings, and Vevro advertisements on third party sites and mobile applications. This helps us and our service providers provide more relevant advertising to you. We and our third party service providers may also use web beacons to monitor user behaviour and collect information about visitors viewing a web page.

We may use information collected to calculate aggregate, anonymised statistics about our user community for the purpose of enhancing our Vevro Offerings, or for security purposes.

If you access a Social Offering, we may use your social networking site profile ID to link your social networking site account with your activities within the Social Offering or offer personalised Vevro advertisements on the social networking site. We may use your social networking site first, last and user names and icon to identify you to the social networking site account you've linked to your activities within the Social Offering, as well as for the purposes of rankings, competitions, sweepstakes, game high scores and/or identification to your social network.

If you access a Social Offering and provide us with another person's contact information for purposes of delivering information through a Social Offering, we may use this information to contact and, if necessary, remind that person that she or he has been invited to join a Social Offering or received content through a Social Offering. All invitees are provided with the option not to receive further invitations from Vevro.

We at Vevro take reasonable measures to help protect the information we collect from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction.

#### SHARING INFORMATION

We may share customer information with Vevro Affiliates, and as described below.

##### Third Party Marketplaces and Service Providers:

We may disclose your personal information as well as aggregate, anonymous information to third party business partners, marketplaces, and third parties who perform services for us, such as credit card processing, prize redemption, delivering packages, sending postal mail, collecting and analysing data, providing search results and links (including paid listings and links), and providing advertising and marketing assistance, including serving ads on our behalf on third party websites and mobile applications and serving ads on behalf of third parties within certain Vevro Offerings. Those third parties may have access to your personal information as necessary to perform their functions, and for no other purposes.

#### Business Transfers:

As Vevro continues to grow, we might sell or buy certain subsidiaries and/or business units. In such transactions, customer information is generally one of the transferred assets. Also, in the event that Vevro or substantially all of its assets are acquired, customer information would in most cases be one of the transferred assets.

#### Protection of Vevro and Others:

We may also disclose your information if there is a violation of the Terms of Use or other agreements; if we have a good faith belief that the law requires it; or if needed to protect the rights, property or safety of Vevro, our customers or others. This includes exchanging information with entities for fraud detection and protection, and credit risk reduction.

#### YOUR CHOICES

##### Promotional email communications:

When you create a customer account or provide access to your email address via an Vevro Offering, you may be automatically registered to receive one or more of our promotional e-newsletters or other promotional material. Note that when you provide an email address through an Vevro Offering, we treat that as a request to be enrolled in one of our promotional e-newsletter lists, even if you previously opted out of receiving newsletters from us, but if you change your mind and wish to opt out again, you may do so at any time by clicking the "unsubscribe" link at the bottom of any newsletter and then following the instructions provided. If you express interest in an Vevro Offering by clicking on a banner within a newsletter, you may be automatically registered to receive newsletters relating to the Vevro Offering that appeared in the banner.

At any time, you may opt-out of receiving a newsletter by selecting the "unsubscribe" link at the bottom of any newsletter. We treat each Vevro Offering individually, so if you are receiving mailings from more than one Vevro Offering, if you want to unsubscribe you must do so with respect to each individually. You may also contact us through [hello@vevrodigital.com](mailto:hello@vevrodigital.com) or our Veta™ chatbot on [www.vevro.com](http://www.vevro.com) or on our Facebook page.

Please note that we reserve the right to send you non-promotional, account or administrative emails even if you opt out of receiving promotional e-newsletters.

##### Cookies, Online Advertising and Analytics:

Please refer to your browser settings and help section to learn about blocking, erasing or being notified of cookies. You can manage your Flash cookies by using Adobe's Flash management here also any other web cookies via cookie browsers and editors. However, because cookies allow you to take advantage of some of Vevro Offerings' essential features, we recommend that you leave cookies turned on. For example, you may not be able make purchases on Vevro Offerings without having cookies turned on, or your high scores may not be saved without having your cookies on. To opt out of receiving personalised advertising

from many ad networks, data exchanges, marketing analytics and other services providers, please visit [www.vevro.com](http://www.vevro.com) or use unsubscribe option in our newsletters.

#### Mobile Advertising:

Most mobile devices provide the ability to opt out of the collection and use of information from the apps you use for purposes of serving ads targeted to your interests. For more information, and to exercise these choices, consult the settings on your device.

#### Social Offerings:

With respect to Social Offerings, you may manage your own social network privacy preferences through your social networking site account.

#### THIRD-PARTIES

Vevro Offerings may allow you to play or share information through social media (such as by logging in through a social media account or using a "Like" button") or contain links to social media services or other third parties. The use of these features and links are subject to the privacy policies of those companies and your settings on those services. Vevro has no control over, and is not responsible for, the information submitted to or collected by social networks or other third parties. We encourage you to review those third party privacy policies to understand the way your information may be collected and handled by such third parties.

#### CHAT & MESSAGING

Vevro Offerings may operate message boards and/or chat areas where users can exchange ideas and communicate with each other. When posting to a message board or chat area, the information is being made publicly available in an online environment. Any information posted is the sole responsibility of the individual user.

#### CHILDREN

Vevro Offerings are designed to avoid the collection and use of "personal information" from children under 13 years other than for support of internal operations. We do not knowingly collect personal information from children. If you are under 13, you may not register for an account or otherwise provide any personal information to us.

Vevro respects the privacy of parents and children. If a parent believes that his or her child has submitted personal information to Vevro, he or she can contact us via email at [hello@vevrodigital.com](mailto:hello@vevrodigital.com) or postal mail at: Vevro (Pvt) Ltd., Vevro Development Hub, 2<sup>nd</sup> Floor, 39, Perera Mawatha, Rajagiriya. We will take the necessary steps to promptly delete the information upon learning that it relates to a child under the age of 13. We recognise the importance of safeguarding the privacy of children and encourage parents to check and monitor their children's use of online activities regularly.

#### AGREEMENT WITH VEVRO POLICIES

By accessing and/or using any of the Vevro Offerings, you signify your understanding of and agreement with this Privacy Policy, and to our Terms of Use. If you do not agree with our policies or Terms of Use, please do not access or use any Vevro Offerings.

#### CHANGES TO PRIVACY POLICY

We may modify this Privacy Policy from time to time. When we post changes to this Privacy Policy, we will revise the "last modified" date at the top of this page. We encourage you to periodically review this Privacy Policy to be informed of how Vevro protects your information and you agree that the last modified version of the Privacy policy shall be governing between you and us.

If there are any questions regarding this privacy policy, you may contact us using the information below.