

Protecting your privacy is really important to Twneel. Accordingly, we're providing this Privacy Policy to explain our practices regarding the collection, use and disclosure of information that we receive when you use the Twneel Services (as defined in our Terms of Service). This Privacy Policy applies only to those websites, services and applications included within "Services" and doesn't apply to any third-party websites, services or applications, even if they are accessible through our Services. Also, please note that, unless we define a term in this Privacy Policy, all capitalized words used in this Privacy Policy have the same meanings as in our Terms of Service.

## **How do we collect and use information?**

Our primary goals in collecting information are to provide and improve our Services, to administer your use of the Services (including your Account, if you are an Account holder), and to enable you to enjoy and easily navigate our Services.

**Account Information.** When you create an Account we'll collect certain information that can be used to identify you, such as your name or any additional profile information ("Personally Identifiable Information" or "PII"). If you register as a Trusted Entity, we may also collect PII such as a business address and other business related information. We may also collect certain information that is not PII because it cannot be used by itself to identify you, such as a Business User's job title or the logo of a Business User employer's business.

**Information Collected Using Cookies.** We collect certain information through the use of "cookies," which are small text files that are saved by your browser when you access our Services. We may use both session cookies and persistent cookies to identify that you've logged in to the Services and to tell us how and when you interact with our Services. We may also use cookies to monitor aggregate usage and web traffic routing on our Services and to customize and improve our Services. Unlike persistent cookies, session cookies are deleted when you log off from the Services and close your browser. Although most browsers automatically accept cookies, you can change your browser options to stop automatically accepting cookies or to prompt you before accepting cookies. Please note, however, that if you don't accept cookies, you may not be able to access all portions or features of the Services. Some third-party services providers that we engage (including third-party advertisers) may also place their own cookies on your browser. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties. We may also use "pixel tags," "web beacons," "clear GIFs" or similar means (individually or collectively "Pixel Tags") in connection with our Services to collect usage and demographic data. A Pixel Tag is an electronic image, which is typically a transparent graphic that is placed on a webpage and may be associated with cookies on your hard drive. Pixel Tags allow us to count users who have visited certain pages of the Services, to deliver branded services and to help determine the effectiveness of our Services.

**Information Related to Use of the Services.** Our servers automatically record certain information about how a User uses our Services (we refer to this information as "Log Data"), for both including Individuals and Trusted Entities ("Users"). Log Data may include information such as a User's Internet Protocol (IP) address, browser type, operating system, internet provider, the web page that a User was visiting before accessing our Services (when applicable), and the Content exchanged between the Users of the Services. We use this information to administer the Services and we analyze (and may engage third parties to analyze) this information to improve and enhance the Services by expanding their features and functionality

and tailoring them to our Users' needs and preferences. We may use information to fight spam, malware and identity theft.

**Location Information.** In some cases we collect and store location information from users of the Services. We may use location information to improve and personalize our Services for you.

**Communication between Individuals.** Twonel will take reasonable measures to avoid collecting information related to Individuals In-Services messaging.

**Communication between Trusted Entities and Individuals.** Twonel will take reasonable measures to keep the Content exchanged between Trusted Entities and Individuals secure and available only the originating parties.

## What Information Do We Share With Third Parties?

We will not share any PII that we have collected from our Users except as described below:

**For Individuals.** If you send any comments or questions to any Trusted Entity, we will share your comment or questions with the applicable Trusted Entity. Such Trusted Entities may respond to your comments or questions directly via the Services or may contact you via the Services to send you Trusted Entity related information, marketing materials or other materials that may be of interest to you. You may opt out of receiving such materials by blocking the applicable Business User via the Services.

**Information Shared with Our Services Providers.** We may engage third party service providers to work with us to administer and provide the Services. These third-party services providers have access to your PII only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your PII for any other purpose.

**Information Shared with Third Parties.** We may share aggregated information and non-identifying information with third parties for industry analysis, demographic profiling, and , and other similar purposes.

**Information Disclosed in Connection with Business Transactions.** Information that we collect from our users, including PII, is considered to be a business asset. As a result, if we go out of business or enter bankruptcy or if we are acquired as a result of a transaction such as a merger, acquisition or asset sale, your PII may be disclosed or transferred to the third-party acquirer in connection with the transaction.

**Information Disclosed for Our Protection and the Protection of Others.** It is our policy to protect you from having your privacy violated through abuse of the legal systems, whether by individuals, entities or government, and to contest claims that we believe to be invalid under applicable law. However, it is also our policy to cooperate with government and law enforcement officials and private parties. Accordingly, we reserve the right to disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary: (i) to satisfy or comply with any applicable law, regulation or legal process or to respond to lawful requests, including subpoenas, warrants or court orders; (ii) to protect our property, rights and safety and the rights, property and safety of third parties or the public in general; and (iv) to prevent or stop activity we consider to be illegal or unethical.

## **The Security of Your Information**

We take reasonable measures to protect the information that we collect from or about you (including your PII and Content exchanged between Users) from unauthorized access, use or disclosure. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

## **Links to Other Sites**

Our Services may contain links to other websites and services. Any information that you provide on or to a third-party website or service is provided directly to the owner of the website or service and is subject to that party's privacy policy. Our Privacy Policy does not apply to such websites or services and we're not responsible for the content, privacy or security practices and policies of those websites or services. To protect your information we recommend that you carefully review the privacy policies of other websites and services that you access.

## **Modifying Your Information**

You can access and modify the PII associated with your Account via the "Settings" section of the Services. If you want us to delete your PII and your Account, you may "delete" your Account via the App or contact us. We'll take steps to delete your information as soon as is practicable, but some information may remain in archived/backup copies for our records or as otherwise required by law.

## **International Transfer**

Your PII may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you're located outside the United States and choose to provide your PII to us, we may transfer your PII to the United States and process it there.

## **Our Policy Toward Children**

Our Services are not directed to children under 9 and we do not knowingly collect PII from children under 9. If we learn that we have collected PII of a child under 9 we will take steps to delete such information from our files as soon as possible.

## **Changes to Privacy Policy**

Any information that we collect is subject to the privacy policy in effect at the time such information is collected. We may, however, modify and revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we'll notify you of such changes by posting them on the Services or by sending you an email or other notification, and we'll indicate when such changes will become effective.

## **Questions?**

Please contact us at [contact@twonel.com](mailto:contact@twonel.com) if you have any questions about our Privacy Policy.

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