

# Dil Mil, Inc. Privacy policy

**Last Updated: October 20, 2020**

Dil Mil, Inc. ("Dil Mil", "we," and "us") respects the privacy of its user ("you") and has developed the Privacy Policy to demonstrate its commitment to protecting your privacy.

Thank you for visiting Dil Mil. We at Dil Mil are committed to protecting the information you share with us, and explaining how we collect, process, and share that information. This Privacy Policy describes the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. We encourage you to read this Privacy Policy carefully when using our application or services or transacting business with us. By using our website or application (our "Service"), you are accepting the practices described in this Privacy Policy and providing your consent to the processing of personal information as described below.

We are the publishers of Dil Mil, a mobile app for connecting people around the world. If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

## 1. Information we collect about you

IN GENERAL. WE MAY COLLECT INFORMATION THAT CAN IDENTIFY YOU SUCH AS YOUR NAME AND EMAIL ADDRESS ("PERSONAL INFORMATION") AND OTHER INFORMATION THAT DOES NOT IDENTIFY YOU. WE MAY COLLECT THIS INFORMATION THROUGH A WEBSITE OR A MOBILE APPLICATION.

**Information you provide.** In order to register as a user with Dil Mil, you may be asked to sign in using your Facebook login or your phone number. If you choose to sign in with Facebook, you authorize us to access certain Facebook account information, such as your public Facebook profile (consistent with your privacy settings in Facebook), your email address, interests, likes, gender, birthday, education history, relationship interests, current city, photos, personal description, friend list, and information about and photos of your Facebook friends who might be common Facebook friends with other Dil Mil users. You will also be asked to allow Dil Mil to collect your location information from your device when you download or use the Service. In addition, we may collect and store any personal information you provide while using our Service or in some other manner. This may include identifying information, such as your name, address, email address and telephone number, and, if you transact business with us, financial information. You may also provide us photos, a personal description and information about your gender and preferences for recommendations, such as search distance, age range, religion, community, education, height, occupation, and gender. If you chat with other Dil Mil users, you provide us the content of your chats, and if you contact us with a customer service or other inquiry, you provide us with the content of that communication.

Some of the information you choose to provide us may be considered "special" or "sensitive" in certain jurisdictions, for example your sexual orientation or religious beliefs. By choosing to provide this information, you consent to our processing of that information.

USE OF TECHNOLOGIES TO COLLECT INFORMATION. WE USE VARIOUS TECHNOLOGIES TO COLLECT INFORMATION FROM YOUR DEVICE AND ABOUT YOUR ACTIVITIES ON OUR SERVICE.

**Technical information collected automatically.** We automatically collect information from your browser or device when you visit our Service. This information could include your IP address, device ID and type, your browser type and language, the operating system used by your device, access times, your mobile device's geographic location while our application is actively running, and the referring website address.

**Cookies and Use of Cookie Data.** When you visit our Service, we may ask you to allow us to assign your device one or more cookies to facilitate access to our Service and to personalize your experience. Through the use of a cookie, we also may automatically collect information about your activity on our Service, such as the pages you visit, the time and date of your visits and the links you click. Cookies may be used to keep you logged in or provide a continuous interactive website experience on the website or app and will not be used to store personally identifiable information. If we advertise, we (or third parties) may use certain data collected on our Service to show you Dil Mil advertisements on other sites or applications. You can refuse cookies by turning them off in your browser. Your web browser's help function should tell you how to do this. Alternatively, you can find information about how to do this for all the commonly used internet browsers at <http://www.aboutcookies.org/default.aspx>. This website will also explain how you can delete cookies which are already stored on your device. If you turn off cookies, though, we will not be able to track your order to enable you to purchase from our site. Nor will we be able to recognize you as a registered user, which allows you to access your account information.

**Pixel tags.** We embed pixel tags (also called web beacons or clear GIFs) on web pages, ads, and emails. These tiny, invisible graphics are used to access cookies and track user activities (such as how many times a page is viewed). We use pixel tags to measure the popularity of our features and services. Ad companies also use pixel tags to measure the number of ads displayed and their performance (such as how many people clicked on an ad).

**Mobile Device IDs:** If you're using our app, we use mobile device IDs (the unique identifier assigned to a device by the manufacturer), or Advertising IDs (for iOS 6 and later), instead of cookies, to recognize you. We do this to store your preferences and track your use of our app. Unlike cookies, device IDs cannot be deleted, but Advertising IDs can be reset in "Settings" on your iPhone. Ad companies also use device IDs or Advertising IDs to track your use of the app, track the number of ads displayed, measure ad performance and display ads that are more relevant to you. Analytics companies use device IDs to track information about app usage.

**Information collected by third-parties for advertising purposes.** We may allow service providers, advertising companies and ad networks, and other third parties to display advertisements on our Service. These companies may use tracking technologies, such as cookies or web beacons, to collect information about users who view or interact with their advertisements. We do not provide any non-anonymized personal information to third parties. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative, which offers a single

location to opt out of ad targeting from member companies ([www.networkadvertising.org](http://www.networkadvertising.org)). Opting out will not decrease the number of advertisements you see.

### **Information you provide about yourself while using our Service**

WE PROVIDE AREAS ON OUR SERVICE WHERE YOU CAN POST INFORMATION ABOUT YOURSELF AND OTHERS AND COMMUNICATE WITH OTHERS. SUCH POSTINGS ARE GOVERNED BY OUR TERMS OF USE. ALSO, WHENEVER YOU VOLUNTARILY DISCLOSE PERSONAL INFORMATION ON PUBLICLY-VIEWABLE PAGES, THAT INFORMATION WILL BE PUBLICLY AVAILABLE AND CAN BE COLLECTED AND USED BY OTHERS. FOR EXAMPLE, IF YOU POST YOUR EMAIL ADDRESS, YOU MAY RECEIVE UNSOLICITED MESSAGES. WE CANNOT CONTROL WHO READS YOUR POSTING OR WHAT OTHER USERS MAY DO WITH THE INFORMATION YOU VOLUNTARILY POST, SO WE ENCOURAGE YOU TO EXERCISE DISCRETION AND CAUTION WITH RESPECT TO YOUR PERSONAL INFORMATION.

## **2. How we use the information we collect**

IN GENERAL, WE MAY USE INFORMATION THAT WE COLLECT ABOUT YOU TO:

1. deliver and improve our products and services, and manage our business;
2. manage your account and provide you with customer support;
3. perform research and analysis about your use of, or interest in, our or others' products, services, or content;
4. communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us or other third parties;
5. develop, display, and track content and advertising tailored to your interests on our Service and other sites, including providing our advertisements to you when you visit other sites;
6. website or mobile application analytics;
7. verify your eligibility and deliver prizes in connection with contests and sweepstakes;
8. enforce or exercise any rights in our Terms of Use; and
9. perform functions or services as otherwise described to you at the time of collection;
10. to create aggregated data for internal use or for improving Service and creating new features. Aggregated data is anonymous and is not linked to any personal data. Aggregate Information helps understand trends and customer needs so that new products and services can be considered and so existing products and services can be tailored to customer desires.

JOB APPLICANTS. IF YOUR PERSONAL INFORMATION IS SUBMITTED THROUGH OUR WEBSITE WHEN APPLYING FOR A POSITION WITH OUR COMPANY, THE INFORMATION WILL BE USED SOLELY IN CONNECTION WITH CONSIDERING AND ACTING UPON YOUR APPLICATION. WE MAY RETAIN YOUR PERSONAL INFORMATION, BUT ONLY FOR THE PURPOSE OF CONSIDERING YOUR APPLICATION FOR CURRENT OR FUTURE AVAILABLE POSITIONS. THIS INFORMATION, WHICH MAY INCLUDE YOUR NAME

AND CONTACT INFORMATION, PRIOR EDUCATION AND EXPERIENCE, AND OTHER INFORMATION YOU PROVIDE TO US, MAY BE SHARED WITH YOUR CONSENT TO THIRD-PARTY SERVICE PROVIDERS RETAINED BY US TO COLLECT, MAINTAIN AND ANALYZE CANDIDATE SUBMISSIONS FOR JOB POSTINGS.

IN ALL CIRCUMSTANCES, WE MAY PERFORM THESE FUNCTIONS DIRECTLY OR USE A THIRD PARTY VENDOR TO PERFORM THESE FUNCTIONS ON OUR BEHALF WHO WILL BE OBLIGATED TO USE YOUR PERSONAL INFORMATION ONLY TO PERFORM SERVICES FOR US. ALSO, IF YOU ACCESS OUR SERVICE FROM A THIRD PARTY SOCIAL PLATFORM, SUCH AS FACEBOOK, WE MAY SHARE NON-PERSONAL INFORMATION WITH THAT PLATFORM TO THE EXTENT PERMITTED BY YOUR AGREEMENT WITH IT AND ITS PRIVACY SETTINGS.

To process your information as described above, we rely on the following legal bases:

- *Provide our service to you:* Most of the time, the reason we process your information is to perform the contract that you have with us.
- *Legitimate interests:* We may use your information where we have legitimate interests to do so.
- *Consent:* From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Policy.

### **3. With whom we share your information**

INFORMATION SHARED WITH OTHER USERS. WHEN YOU REGISTER AS A USER OF DIL MIL, YOUR DIL MIL PROFILE WILL BE VIEWABLE BY OTHER USERS OF THE SERVICE. OTHER USERS WILL BE ABLE TO VIEW INFORMATION YOU HAVE PROVIDED TO US DIRECTLY OR THROUGH FACEBOOK, SUCH AS YOUR FACEBOOK PHOTOS, ANY ADDITIONAL PHOTOS YOU UPLOAD, YOUR FIRST NAME, YOUR AGE, APPROXIMATE NUMBER OF MILES AWAY, YOUR PERSONAL DESCRIPTION, INFORMATION YOU HAVE IN COMMON WITH THE PERSON VIEWING YOUR PROFILE, SUCH AS COMMON FACEBOOK FRIENDS AND LIKES, AND INFORMATION YOU SHARED IN THE APP SUCH AS YOUR RELIGION, EDUCATION, COMMUNITY, HEIGHT, AND OCCUPATION. ALSO INFORMATION GATHERED BY INTEGRATIONS OF THIRD PARTY SERVICES SUCH AS LINKEDIN AND INSTAGRAM. IF YOU CLICK ON THE LIKE (HEART) TO SAY "YES" TO A PERSON, YOU WILL BE ABLE TO CHAT WITH THAT PERSON IF THEY SAY YES TO YOU, E.G., WHEN YOU HAVE A "MATCH." IF YOU CHAT WITH YOUR MATCH, OF COURSE YOUR MATCH WILL SEE THE CONTENT OF YOUR CHAT.

PERSONAL INFORMATION. WE DO NOT SHARE YOUR PERSONAL INFORMATION WITH OTHERS EXCEPT AS INDICATED IN THIS PRIVACY POLICY. WE MAY SHARE PERSONAL INFORMATION WITH:

(1) **Service providers:** We may share information, including personal and financial information, with third parties that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, ad tracking and analytics, member screenings, assisting us with storage and data analysis; preventing from fraudulent activities; maintaining, collecting payments; supporting our Service functionality, and supporting

contests, sweepstakes, surveys and other features offered through our Service. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes.

We follow a strict vetting process prior to engaging any service provider or working with any partner. All of our service providers and partners must agree to strict confidentiality obligations.

(2) We may share your information internally within our family of companies, our affiliates or subsidiaries, to assist us in processing your information, as service providers, upon our instructions and on our behalf. Assistance provided by our affiliates or subsidiaries may include technical processing operations, such as data hosting and maintenance, customer care, marketing and targeted advertising, finance and accounting assistance, better understanding how our service is used and users' behavior to improve our service, securing our data and systems and fighting against spam, abuse, fraud, infringement and other wrongdoings.

We may also share information with our affiliates or subsidiaries for legitimate business purposes such as corporate audit, analysis and consolidated reporting as well as compliance with applicable laws.

(3) **For corporate transactions.** We may transfer or share your personal data in cases where Dil Mil, Inc., or one of its properties, affiliates, or subsidiaries, are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, sell part of its assets, or other change of ownership or control.

(4) OTHER SITUATIONS. WE MAY DISCLOSE YOUR INFORMATION, INCLUDING PERSONAL INFORMATION:

In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our Terms of Use or other agreements or policies. In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

### **(C) THIRD PARTY WEBSITES**

THERE ARE A NUMBER OF PLACES ON OUR SERVICE WHERE YOU MAY CLICK ON A LINK TO ACCESS OTHER WEBSITES THAT DO NOT OPERATE UNDER THIS PRIVACY POLICY. FOR EXAMPLE, IF YOU CLICK ON AN ADVERTISEMENT ON OUR SERVICE, YOU MAY BE TAKEN TO A WEBSITE THAT WE DO NOT CONTROL. THESE THIRD-PARTY WEBSITES MAY INDEPENDENTLY SOLICIT AND COLLECT INFORMATION, INCLUDING PERSONAL INFORMATION, FROM YOU AND, IN SOME INSTANCES, PROVIDE US WITH INFORMATION ABOUT YOUR ACTIVITIES ON THOSE WEBSITES. WE RECOMMEND THAT YOU CONSULT THE PRIVACY STATEMENTS OF ALL THIRD-PARTY WEBSITES YOU VISIT BY CLICKING ON THE "PRIVACY" LINK TYPICALLY LOCATED AT THE BOTTOM OF THE WEBPAGE YOU ARE VISITING.

#### **4. Cross-Border Data Transfers**

Sharing of information sometimes involves cross-border data transfers, for instance to the European Union and other jurisdictions. We use standard contract clauses approved by the European Commission or other suitable safeguard to permit data transfers to other countries. Standard contractual clauses are commitments between companies transferring personal data, binding them to protect the privacy and security of your data.

#### **5. AGGREGATED AND/OR NON-PERSONAL INFORMATION.**

WE MAY USE AND SHARE NON-PERSONAL, DE- IDENTIFIED, PSEUDONYMOUS, OR AGGREGATED INFORMATION WE COLLECT UNDER ANY OF THE ABOVE CIRCUMSTANCES. WE MAY ALSO SHARE IT WITH OTHER THIRD PARTIES TO DEVELOP AND DELIVER TARGETED ADVERTISING ON OUR SERVICE AND ON WEBSITES OR APPLICATIONS OF THIRD PARTIES, AND TO ANALYZE AND REPORT ON ADVERTISING YOU SEE. WE MAY COMBINE NON-PERSONAL INFORMATION WE COLLECT WITH ADDITIONAL NON-PERSONAL INFORMATION COLLECTED FROM OTHER SOURCES. WE ALSO MAY SHARE AGGREGATED, NON-PERSONAL INFORMATION, OR PERSONAL INFORMATION IN HASHED, NON-HUMAN READABLE FORM, WITH THIRD PARTIES, INCLUDING ADVISORS, ADVERTISERS AND INVESTORS, FOR THE PURPOSE OF CONDUCTING GENERAL BUSINESS ANALYSIS OR OTHER BUSINESS PURPOSES. FOR EXAMPLE, WE MAY ENGAGE A DATA PROVIDER WHO MAY COLLECT WEB LOG DATA FROM YOU (INCLUDING IP ADDRESS AND INFORMATION ABOUT YOUR BROWSER OR OPERATING SYSTEM), OR PLACE OR RECOGNIZE A UNIQUE COOKIE ON YOUR BROWSER TO ENABLE YOU TO RECEIVE CUSTOMIZED ADS OR CONTENT. THE COOKIES MAY REFLECT DE- IDENTIFIED DEMOGRAPHIC OR OTHER DATA LINKED TO DATA YOU VOLUNTARILY HAVE SUBMITTED TO US (SUCH AS YOUR EMAIL ADDRESS), THAT WE MAY SHARE WITH A DATA PROVIDER SOLELY IN HASHED, NON-HUMAN READABLE FORM. TO OPT-OUT OF COOKIES THAT MAY BE SET BY THIRD PARTY DATA OR ADVERTISING PARTNERS, PLEASE GO TO <http://WWW.ABOUTADS.INFO/CHOICES/>.

#### **6. Do Not Track Disclosure**

DO NOT TRACK ("DNT") IS A PRIVACY PREFERENCE THAT USERS CAN SET IN THEIR WEB BROWSERS. DNT IS A WAY FOR USERS TO INFORM WEBSITES AND SERVICES THAT THEY DO NOT WANT CERTAIN INFORMATION ABOUT THEIR WEBPAGE VISITS COLLECTED OVER TIME AND ACROSS WEBSITES OR ONLINE SERVICES. WE ARE COMMITTED TO PROVIDING YOU WITH MEANINGFUL CHOICES ABOUT THE INFORMATION WE COLLECT AND THAT IS WHY WE PROVIDE THE OPT-OUT LINKS ABOVE. HOWEVER, WE DO NOT RECOGNIZE OR RESPOND TO ANY DNT SIGNALS, AS THE INTERNET INDUSTRY WORKS TOWARD DEFINING EXACTLY WHAT DNT MEANS, WHAT IT MEANS TO COMPLY WITH DNT, AND A COMMON APPROACH TO RESPONDING TO DNT.

#### **7. How you can access your information**

We take reasonable steps to help ensure that the Personal Information we collect from you is accurate, complete and current. In addition to accessing your Personal Information through the app or website, you may also request access to your Personal Information, request that erroneous or inaccurate Personal Information be updated, or request deletion of your Personal Information, by contacting us via email at [support@dilmil.co](mailto:support@dilmil.co).

You also may close your account at any time by visiting the "Settings" page for your account. If you close your account, we will retain certain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, enforce our Terms of Use, take actions we deem necessary to protect the integrity of our service or our users, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties (excluding processors) as described in this Privacy Policy, retention of that information may be subject to those Third Parties' policies.

We will respond promptly to your requests in accordance with applicable law. For your protection, we may only implement requests with respect to the personal information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We may decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we may need to retain certain personal information for a longer period for recordkeeping purposes, such as retaining records relating to your purchases for warranty or accounting purposes.

## **8. Your choices about collection and use of your information**

You can choose not to provide us with certain information, but that may result in you being unable to use certain features of our Service because such information may be required in order for you to register as a user, purchase products or services, participate in a contest, promotion, survey, or sweepstakes, ask a question, or initiate other transactions.

Our Service may also deliver notifications to your phone or mobile device. You can disable these notifications by changing the settings on your mobile device. You can also control information collected by cookies. You can delete or decline cookies by changing your browser settings. Click "help" in the toolbar of most browsers for instructions.

## **9. How we protect your personal information**

WE TAKE REASONABLE AND APPROPRIATE SECURITY MEASURES TO HELP SAFEGUARD YOUR PERSONAL INFORMATION FROM UNAUTHORIZED ACCESS AND DISCLOSURE. HOWEVER, NO SYSTEM CAN BE COMPLETELY SECURE. THEREFORE, USERS SHOULD ALSO TAKE CARE WITH HOW THEY HANDLE AND DISCLOSE THEIR PERSONAL INFORMATION AND SHOULD AVOID SENDING PERSONAL INFORMATION

THROUGH INSECURE COMMUNICATION CHANNELS, SUCH AS EMAIL. PLEASE REFER TO THE FEDERAL TRADE COMMISSION'S WEBSITE AT <http://WWW.FTC.GOV/BCP/MENUS/CONSUMER/DATA.SHTM> FOR INFORMATION ABOUT HOW TO PROTECT YOURSELF AGAINST IDENTITY THEFT.

## **10. Children's privacy**

ALTHOUGH OUR SERVICE IS A GENERAL AUDIENCE SERVICE, WE RESTRICT THE USE OF OUR SERVICE TO INDIVIDUALS AGE 18 AND ABOVE. WE DO NOT KNOWINGLY COLLECT, MAINTAIN, OR USE PERSONAL INFORMATION FROM CHILDREN UNDER THE AGE OF 18.

## **11. Visiting our Service from outside the United States**

The website is controlled and operated from the United States and is not intended to subject Dil Mil to the laws or jurisdiction of any state, country, or territory other than the United States. Your personal information may be stored and processed in any country where we have offices or in which our third party service providers reside. IF YOU ARE VISITING OUR SERVICE FROM OUTSIDE THE UNITED STATES, PLEASE BE AWARE THAT YOUR INFORMATION MAY BE TRANSFERRED TO, STORED, AND PROCESSED IN THE UNITED STATES WHERE OUR SERVERS ARE LOCATED AND OUR CENTRAL DATABASE IS OPERATED. BY USING OUR SERVICES, YOU UNDERSTAND AND AGREE THAT YOUR INFORMATION MAY BE TRANSFERRED TO OUR FACILITIES AND THOSE THIRD PARTIES WITH WHOM WE SHARE IT AS DESCRIBED IN THIS PRIVACY POLICY.

## **12. Data Retention**

While you are subscribed to our service, we will retain your personal information in our records. If you elect to unsubscribe or delete your account, we will remove all personally identifiable information relating to you from our records, unless otherwise permitted or required by applicable law. However, we may retain deidentified, pseudonymised or aggregated copies of non-identifiable data sets for analytics purposes.

## **13. Your California Privacy Rights**

If you are a resident of California, you have the right under the California "Shine the Light" law (Cal. Civil Code § 1798.83) to request, by regular or electronic mail, a list of the categories of personal information that were shared by Dil Mil with third parties for direct marketing purposes during the immediately preceding calendar year, the names and addresses of those third parties, and if the nature of their business cannot reasonably be determined from their name, examples of the products and services marketed by them. However, as described above, except where necessary to fulfill an order from you for goods or services or as otherwise permitted by applicable law or this Privacy Policy, Dil Mil will not share your data with third parties unless you consent to such disclosure. Alternatively, you may opt out at any

time from any information sharing previously consented to. For these reasons, Dil Mil is not required to respond further to California customer inquiries under the California Shine the Light law.

#### **14. Changes to this Privacy Policy**

WE WILL OCCASIONALLY UPDATE THIS PRIVACY POLICY. WHEN WE POST CHANGES TO THIS PRIVACY POLICY, WE WILL REVISE THE "LAST UPDATED" DATE AT THE TOP OF THIS PRIVACY POLICY. WE RECOMMEND THAT YOU CHECK OUR SERVICE FROM TIME TO TIME TO INFORM YOURSELF OF ANY CHANGES IN THIS PRIVACY POLICY OR ANY OF OUR OTHER POLICIES.

#### **15. How to contact us**

IF YOU HAVE ANY QUESTIONS ABOUT THIS PRIVACY POLICY, PLEASE CONTACT US BY EMAIL OR POSTAL MAIL AS FOLLOWS: Dil Mil, Inc. 200 Townsend St., San Francisco, CA 94107 or [support@dilmil.co](mailto:support@dilmil.co)