

Zenlist, Inc. Privacy Policy

Last revised and effective as of: January 1, 2019

This Privacy Policy relates to information collected online and offline by Zenlist, Inc. ("Zenlist" or "we" or "us" or "our") through your use of the Zenlist mobile application (the "Mobile App"), website (www.zenlist.com) and any subdomains (the "Site") and the services, features, and information available on the Mobile App and/or the Site we may offer (along with associated and successor websites, applications, features, information, and services, or any part thereof, the "Service"). This Privacy Policy is incorporated into, a part of, and is governed by the Zenlist, Inc. Terms of Use. As used herein, "you" means a user of the Service.

You should carefully read this Privacy Policy. By using the Service, you are signifying your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, you may not use the Service.

As used in this Privacy Policy, the terms "using" and "processing" information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.

WHAT INFORMATION ABOUT ME IS COLLECTED?

Depending on your use of the Service, we may collect two types of information: personally identifiable information and non-personally identifiable information.

Personally Identifiable Information

Personally identifiable information is information that identifies you or can be used to identify or contact you. Such information may include your name, address, e-mail address, telephone number, and billing and credit card information.

Non-Personally Identifiable Information

Non-personally identifiable information is information, any single item of which, by itself, cannot be used to identify or contact you, including demographic information (such as age, profession, gender, current location, zip code, birth date, or year of birth), IP addresses, browser types, domain names, and statistical data involving the use of the Service. Certain non-personally identifiable information may be considered a part of your personally identifiable information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered non-personally identifiable information when they are taken alone or combined only with other non-personally identifiable information (for example, your viewing preferences).

WHERE AND WHEN IS INFORMATION COLLECTED (INCLUDING THROUGH THE USE OF COOKIES AND ACTION TAGS)?

We will collect personally identifiable information that you submit to us. We may also receive personally identifiable information about you from third parties, including social media websites or outlets and third parties providing payment processing, credit and debit card authorization, and fraud screening services as part of your use of the Service.

Registering to Use the Service and in the Course of Using the Service.

You may be required to establish an account in order to take advantage of certain features of the Service. If so, if you wish to establish an account you may be required to provide us with information (including personally identifiable information and non-personally identifiable information) such as name, postal address, e-mail address, birth date and credit card and billing information. We may also receive personally identifiable information about you from third parties providing payment processing, credit and debit card authorization, and fraud screening services as part of the registration process. In addition, we may obtain your personally identifiable information from you if you identify yourself to us by sending us an e-mail with questions or comments. Also, we will have access to any personally identifiable information that you choose to share through the Service (such as your name if you include it in an article or story that you post to the Service).

If you choose to access the Service using the Facebook Login feature, you are providing us with access to all information, attributes, and data in your Facebook public profile. We may freely store and use such information in accordance with this Privacy Policy and the Terms of Use. For the avoidance of doubt, all information in your Zenlist user profile (which, if you choose to access the Service using the Facebook Login feature will include all information, data, and attributes in your Facebook public profile, including without limitation your access token, e-mail address, first and last name, link, gender, id, and locale, as well as any other information in your Facebook account that you have granted Zenlist permission to access). Such information will be stored by Zenlist and will be used in connection with providing the Service, to contact you, and to identify you to other users of the Service (such as when you list, comment or communicate within the Service, and will be part of the Public Areas (as defined below) of the Service and available to the public, including to all users of the Service.

Cookies and Action Tags.

We may collect non-personally identifiable information passively using "cookies" and "action tags."

"Cookies" are small text files that can be placed on your computer or mobile device in order to identify your Web browser and the activities of your computer on the Service and other websites. Cookies can be used to personalize your experience on the Service (such as

dynamically generating content on webpages specifically designed for you), to assist you in using the Service (such as saving time by not having to reenter your name each time you use the Service), to allow us to statistically monitor how you are using the Service to help us improve our offerings, and to target certain advertisements to your browser which may be of interest to you or to determine the popularity of certain content.

In addition to cookies that we may place on your computer or mobile device, cookies might also be placed on your computer or mobile device by third parties that we use to display or serve advertisements or to collect non-personally identifiable information in order to provide advertising-related services. In the course of serving advertisements, such third-party advertisers could place or recognize unique cookies on your browser.

You do not have to accept cookies to use the Service. Although most browsers are initially set to accept cookies, you may reset your browser to notify you when you receive a cookie or to reject cookies generally. Most browsers offer instructions on how to do so in the "Help" section of the toolbar. However, if you reject cookies, certain features or resources of the Service may not work properly or at all and you may experience some loss of convenience.

"Action tags," also known as web beacons or gif tags, are a web technology used to help track website usage information, such as how many times a specific page has been viewed. Action tags are invisible to you, and any portion of the Service, including advertisements, or e-mail sent on our behalf, may contain action tags.

By using cookies and action tags together, we are able to gain valuable information to improve the Service and measure the effectiveness of our advertising and marketing campaigns.

Finally, you should be aware that advertisers and other third parties may use their own cookies or action tags when you click on their advertisement or a link to their websites or services on or from the Service. This Privacy Policy does not govern the use by such third-party websites or services or providers of third-party advertising.

Log Files.

We also collect non-personally identifiable information through our Internet log files, which record data such as user IP addresses, browser types, domain names, and other anonymous statistical data involving the use of the Service. This information may be used to analyze trends, to administer the Service, to monitor the use of the Service, and to gather general demographic information. We may link this information to personally identifiable information for these and other purposes such as personalizing your experience on the Service and evaluating the Service in general.

IS INFORMATION SUBMITTED TO THE PUBLIC AREAS OF THE SERVICE PRIVATE?

No. Any information shared in the Public Areas (as defined below) of the Service is available to the public, including to all users. Such information is not protected or treated as confidential, can be used in any manner, and is not subject to this Privacy Policy. For the avoidance of doubt, your user profile (which, if you choose to access the Service using the Facebook Login feature

will include all information, data, and attributes in your Facebook public profile as well as any other information in your Facebook account that you have granted Zenlist permission to access) and in-Service messages (including those between users) are part of the Public Areas of the Service and available to the public, including to all users of the Service. If you wish to keep any information private or proprietary, do not submit it to or include it within the Public Areas of the Service. NOTWITHSTANDING THE FOREGOING, WE HAVE NO RESPONSIBILITY OR LIABILITY IF A USER'S INFORMATION OR IDENTIFY IS MISUSED OR STOLEN, OR IF A USER SUFFERS HARM AS A RESULT OF VOLUNTARY DISCLOSURES.

DOES POCKETLIST COLLECT INFORMATION FROM CHILDREN UNDER 13 YEARS OF AGE?

We are committed to protecting the privacy of children. The Service is not designed for or directed to children under the age of 13. We do not collect personally identifiable information from any person we actually know is under the age of 13.

IS A USERNAME OR AVATAR OR PHOTO PRIVATE?

No. A user's username and avatar and photo are available to the public, including to all users, when a user shares or posts information in the Public Areas (as defined below) of the Service, including without limitation where a user has published listings, comments, or communications. In order to discourage misuse of the Service and to build trust among users, except in extraordinary circumstances as agreed to by Zenlist in its sole discretion, when prompted to create a username, we require users to use their actual name, and when prompted to submit a photo or avatar, we require users to use their actual likeness. Accordingly, all users of the Service will be identified to other users of the Service in the Public Areas by their real names (or variations of their names, such as their names followed by a numeral), not by aliases or other similar devices, and with their real likeness. By using the Service, you consent to the display of your real name and real likeness to the public, including to all users of the Service. This includes display of your Facebook user profile name and any information, data, and attributes in your Facebook public profile, should you use the Facebook Login feature to create, or in connection with, your Zenlist user account. Additionally, we may display certain geographical information about users of the Service, such as what countries, states, provinces and/or cities the users are located in, as well as any other information available in your Facebook account that you have granted Zenlist permission to access. With this information, other users of the Service could use publicly available resources to discover additional personally identifiable information about you, such as your address and phone number.

IS A USER PROFILE PRIVATE?

No. User profiles are part of the Public Areas (as defined below) of the Service. All information in your user profile (which, if you choose to access the Service using the Facebook Login

feature will include all information, data, and attributes in your Facebook public profile as well as any other information in your Facebook account that you have granted Zenlist permission to access) is part of the Public Areas of the Service and available to the public, including to all users of the Service.

WHAT DOES POCKETLIST DO WITH THE INFORMATION IT COLLECTS?

In general, we use the information collected to provide the Service to you and process your transactions, to help us understand who uses the Service, for internal operations such as operating and improving the Service, to contact you for customer service and billing purposes, to facilitate the delivery of advertising, and so that we can contact you about products and services that may be of interest to you.

We may use your information to send you a welcoming e-mail that may confirm your user name and password. If you "opt in", we may send you electronic newsletters, contact you about the Service, products, services, information and news that may be of interest to you, and provide you with targeted feedback. You may opt in by clicking the appropriate box at the time you create your Zenlist user account or by following such other procedures that we may specify. If you no longer desire to receive these communications, we will provide you with the option to change your preferences. If you identify yourself to us by sending us an e-mail with questions or comments, we may use your information (including personally identifiable information) to respond to your questions or comments, and we may file your questions or comments (with your information) for future reference. We may also use the information collected to send announcements and updates regarding the Service or, if applicable, about your billing account status. You will not be able to unsubscribe from these Service announcements and updates as they contain important information relevant to your use of the Service.

We may also use the information gathered to perform statistical analysis of user behavior or to evaluate and improve the Service. We may link some of this information to personally identifiable information for internal purposes or to improve your experience with the Service.

WHEN DOES POCKETLIST DISCLOSE INFORMATION TO THIRD PARTIES?

Except as set forth in this Privacy Policy or our Terms of Use or as specifically authorized by you, we will not disclose any information we gather from you through the Service.

Laws and Legal Rights.

We may disclose your information (including personally identifiable information) if we believe in good faith that we are required to do so in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, or other valid legal process. We may disclose personally identifiable information in special circumstances when we

have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating the Zenlist, Inc. Terms of Use, to detect fraud, for assistance with a delinquent account, or to protect the safety and/or security of our users, the Service or the general public.

Third Parties Generally.

We may provide to third parties non-personally identifiable information, including where such information is combined with similar information of other users of the Service. For example, we might inform third parties regarding the number of unique users who use the Service, the demographic breakdown of our users of the Service, or the products and/or services purchased using the Service and the vendors of such products and services. In addition, when you use the Service, third parties (including without limitation third-party advertisers and commercial partners) may directly collect personally identifiable and non-personally identifiable information about your online activities over time and across different websites. The third parties to which we may provide non-personally identifiable information or who may independently directly collect personally identifiable and non-personally identifiable information may include potential or actual advertisers, providers of advertising products or services (including vendors and website tracking services), merchants, affiliates and other actual or potential commercial partners, sponsors, licensees, researchers, and other similar parties.

Outside Contractors.

We may employ independent contractors, vendors and suppliers (collectively, "Outside Contractors") to provide specific services and products related to the Service, such as hosting and maintaining the Service, providing payment and credit card processing and fraud screening, and developing applications for the Service. In the course of providing products or services to us, these Outside Contractors may have access to information collected through the Service, including your personally identifiable information. We require that these contractors agree to (1) protect the privacy of your personally identifiable information consistent with this Privacy Policy, and (2) not use or disclose your personally identifiable information for any purpose other than providing us with the products or services for which we contracted or as required by law.

Sale of Business.

We reserve the right to transfer information to a third party in the event of a sale, merger or other transfer of all or substantially all of the assets of Zenlist or any of its Corporate Affiliates (as defined herein), or that portion of Zenlist or any of its Corporate Affiliates to which the Service relates, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Privacy Policy.

Affiliates.

We may disclose information (including personally identifiable information) about you to our Corporate Affiliates. For purposes of this Privacy Policy, "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with Zenlist, whether by ownership or otherwise. Any information relating to you that we provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this Privacy Policy.

Public Areas.

The Service may feature various community areas and other public forums, which include listing areas, discussion boards, comment and question and answer areas as well as your user profile and in-Service messages and communications (including those between users) (the "Public Areas"). These Public Areas are open to the public and should not be considered private. We cannot prevent such information from being used in a manner that may violate this Privacy Policy, the law, or your personal privacy. We are not responsible for the results of such postings or for the accuracy of any information contained in those postings.

Any information you share in a Public Area (including personally identifiable information) is by design open to the public and is not private. You should think carefully before posting any information in any Public Area. What you post can be seen, disclosed to or collected by others and may be used by others in ways we cannot control or predict. As with any public forum on any website, the information you post may also show up in third-party search engines like Google, Yahoo, MSN, and Bing. If you mistakenly post personal information in a Public Area you can send us an e-mail to request that we remove it by contacting us at info@zenlist.com. You should understand that in some cases, we may not be able to remove your personal information.

DOES THIS PRIVACY POLICY APPLY WHEN I LINK TO OTHER WEBSITES OR SERVICES?

This Privacy Policy applies solely to information collected by us through the Service. Our Service may provide you with access to other websites and services. This may include providing you with the ability to automatically post updates on Facebook, Twitter, or other social media websites or outlets. Please be aware that we are not responsible for the privacy practices of any websites or services other than the Service. We encourage you to read the privacy policies or statements of each and every such website and service.

IS THE INFORMATION COLLECTED THROUGH THE SERVICE SECURE?

We want your information (including personally identifiable information) to remain secure. We strive to provide transmission of your information from your computer or mobile device to our servers through techniques that are consistent with industry standards and to employ

administrative, physical, and electronic measures designed to protect your information from unauthorized access.

Notwithstanding the above, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that others could find a way to thwart our security systems. As a result, while we strive to protect your information, we cannot ensure or warrant the security or privacy of any information you transmit to us, and you do so at your own risk.

COULD MY INFORMATION BE TRANSFERRED TO OTHER COUNTRIES?

Personally identifiable information collected on the Service may be transferred from time to time to our offices or personnel, or to third parties, located throughout the world, and the Service may be viewed and hosted anywhere in the world, including countries that may not have laws of general applicability regulating the use and transfer of such data. By using the Service and submitting such information on it, you voluntarily consent to the trans-border transfer and hosting of such information. If you are a user accessing the Service from a jurisdiction with laws or regulations governing personal data collection, use, and disclosure that differ from those of the United States, please be advised that all aspects of the Service are governed by the internal laws of the United States and the Commonwealth of Massachusetts, USA, regardless of your location.

WHAT CHOICES DO I HAVE REGARDING THE COLLECTION, DISCLOSURE AND DISTRIBUTION OF PERSONALLY IDENTIFIABLE INFORMATION?

Except as otherwise described in this Privacy Policy, we will only use personally identifiable information for the purposes described above or as otherwise disclosed at the time we request such information from you. You must "opt in" and give us permission to use your personally identifiable information for any other purpose. You may also change your preference and "opt out" of receiving certain marketing communications from us by changing that option in the My Profile feature of the Service, following the directions provided in association with the communication, or by contacting info@zenlist.com.

DO NOT TRACK

The term "Do Not Track" refers to a HTTP header offered by certain web browsers to request that websites refrain from tracking the user. We take no action in response to Do Not Track requests.

CAN I UPDATE OR CORRECT MY PERSONALLY IDENTIFIABLE INFORMATION?

You have the right to request the restriction of certain uses and disclosures of personally identifiable information as follows. You can contact us in order to (1) update or correct your personally identifiable information, (2) change your preferences with respect to communications and other information you receive from us, or (3) delete the personally identifiable information maintained about you on our systems (subject to the following paragraph), by accessing My Profile or contacting info@zenlist.com. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion. To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for maintaining the secrecy of your unique password and account information at all times.

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your personally identifiable information may exist in a non-erasable form that will be difficult or impossible for us to locate. We promise that promptly after receiving your request, all personally identifiable information stored in databases we actively use and other readily searchable media will be updated, corrected, changed or deleted, as appropriate, as soon as and to the extent reasonably practicable.

HOW WILL I KNOW IF THERE ARE ANY CHANGES TO THIS PRIVACY POLICY?

We may revise this Privacy Policy from time to time. We will not make changes that result in significant additional uses or disclosures of your personally identifiable information without allowing you to "opt in" to such changes. We may also make non-significant changes to this Privacy Policy that generally will not significantly affect our use of your personally identifiable information, for which your opt-in is not required. We encourage you to check this page periodically for any changes. If any non-significant changes to this Privacy Policy are unacceptable to you, you must immediately contact us and, until the issue is resolved, stop using the Service. Your continued use of the Service following the posting of non-significant changes to this Privacy Policy constitutes your acceptance of those changes.

WHO DO I CONTACT IF I HAVE ANY PRIVACY QUESTIONS?

If you have any questions or comments about this Privacy Policy or feel that we are not abiding by the terms of this Privacy Policy, please contact our Privacy Agent in any of the following ways:

By e-mail:

info@zenlist.com

By postal mail or courier:

Attn: Tom MacLeod

Zenlist, Inc.

535 Mission St. Floor 14

San Francisco, CA 94105

BY USING THE SERVICE, YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU SHOULD NOT USE THE SERVICE. CONTINUED USE OF THE SERVICE FOLLOWING THE POSTING OF CHANGES TO THIS PRIVACY POLICY THAT DO NOT SIGNIFICANTLY AFFECT THE USE OR DISCLOSURE OF YOUR PERSONALLY IDENTIFIABLE INFORMATION WILL MEAN THAT YOU ACCEPT THOSE CHANGES.