

PRIVACY POLICY

Tech-13 S.A de C.V. is a software company. Our products and services — including Onspot, advertising, commerce, and others that link to this Privacy Policy — provide fast and fun ways to express yourself, live in the moment, learn about the world, and have fun together!

When you use these services, you'll share some information with us. So we want to be upfront about the information we collect, how we use it, whom we share it with, and the controls we give you to access, update, and delete your information.

That's why we've written this Privacy Policy. And it's why we've tried to write it in a way that's easy to understand for all our users and blissfully free of the legalese that often clouds these documents. Of course, if you still have questions about anything in our Privacy Policy, just contact us.

You should read our entire Privacy Policy. We designed it to give you easy-to-digest summaries of our privacy practices.

Information We Collect

There are three basic categories of information we collect:

- Information you provide.
- Information we get when you use our services.
- Information we get from third parties.

Here's a little more detail on each of these categories.

Information You Provide

When you interact with our services, we collect information that you provide to us. For example, many of our services require you to set up an account, so we may need to collect a few important details about you, such as your name, username, password, email address, phone number, and date of birth. We may also ask you to provide us with some additional information that will be publicly visible on our services, such as a profile picture

or avatar. Some services, such as commerce products, may require you to provide us with a debit or credit card number and its associated account information.

Of course, you'll also provide us whatever information you send through our services, such as Posts. Keep in mind that the users who view your Posts and any other content can always save that content or copy it outside the app. So, the same common sense that applies to the internet at large applies to our services as well: Don't send messages or share content that you wouldn't want someone to save or share.

When you contact customer support or communicate with us in any other way, we'll collect whatever information you volunteer or that we need to resolve your question.

Information We Get When You Use Our Services

When you use our services, we collect information about which of those services you've used and how you've used them. We might know, for instance, that you watched a particular Post, saw a specific ad for a certain period of time, and saved a few Posts. Here's a fuller explanation of the types of information we collect when you use our services:

- **Usage Information.** We collect information about your activity through our services. For example, we may collect information about:
 - how you interact with our services, such as your location or the Posts you. Interact with the most, which Posts you watch on others' profiles.
 - how you communicate with other Spotters, such as their names, the time and date of your communications, the number of Posts you exchange with your friends, which friends you exchange Posts with the most, and your interactions with Posts (such as when you open a Post or capture a screenshot).
- **Content Information.** We collect content you create on our services such as information about the content you create or provide, such as if others have viewed the content and the metadata that is provided with the content.
- **Device Information.** We collect information from and about the devices you use. For example, we collect:

- information about your hardware and software, such as the hardware model, operating system version, device memory, advertising identifiers, unique application identifiers, apps installed, unique device identifiers, device usage data, browser type, keyboards installed, language, battery level, its location and time zone;
 - information from device sensors, such as accelerometers, gyroscopes, compasses, microphones, and whether you have headphones connected; and
 - information about your wireless and mobile network connections, such as mobile phone number, service provider, IP address, and signal strength.
- **Device Phonebook.** Because our services are all about communicating with friends, we may — with your permission — collect information from your device’s phonebook.
 - **Camera, Photos, and Audio.** Many of our services require us to collect images and other information from your device’s camera and photos. For example, you won’t be able to upload photos, such as your profile picture, from your camera roll unless we can access your camera or photos.
 - **Location Information.** When you use our services we may collect information about your location. With your permission, we may also collect information about your precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors, such as gyroscopes, accelerometers, and compasses.
 - **Information Collected by Cookies and Other Technologies.** Like most online services and mobile applications, we may use cookies and other technologies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser, and device. We may also use these technologies to collect information when you interact with services we offer through one of our partners, such as advertising and commerce features. For example, we may use information collected on other websites to show you more relevant ads. Most web browsers are set to accept cookies by default. If you prefer, you can usually remove or reject browser cookies through the settings on your browser or device. Keep in mind, though, that removing or rejecting cookies could affect the availability and functionality of our services. To learn more about

how we and our partners use cookies on our services and your choices, please check out our Cookie Policy.

- **Log Information.** We also collect log information when you use our website, such as:
 - details about how you've used our services;
 - device information, such as your web browser type and language;
 - access times;
 - pages viewed;
 - IP address;
 - identifiers associated with cookies or other technologies that may uniquely identify your device or browser; and
 - pages you visited before or after navigating to our website.

Information We Collect from Third Parties

We may collect information about you from other users, our affiliates, and third parties. Here are a few examples:

- If you link your Onspot account to another service (like Bitmoji or a third-party app), we may receive information from the other service, like how you use that service.
- Advertisers, app developers, publishers, and other third parties may share information with us as well. We may use this information, among other ways, to help target or measure the performance of ads. You can learn more about our use of this kind of third-party data in our Support Center.
- If another user uploads their contact list, we may combine information from that user's contact list with other information we have collected about you.

How We Use Information

What do we do with the information we collect? The short answer is: Provide you with an amazing set of products and services that we relentlessly improve. Here are the ways we do that:

- develop, operate, improve, deliver, maintain, and protect our products and services.
- send you communications, including by email or SMS where permitted. For example, we may use email or SMS to respond to support inquiries or to share information about our products, services, and promotional offers that we think may interest you.
- monitor and analyze trends and usage.
- personalize our services by, among other things, suggesting friends, profile information, helping Spotters find each other in Onspot, affiliate and third-party apps and services, or customizing the content we show you, including ads.
- add context to your Onspot experience, for example by arranging the feed with based on your location (of course, if you've given us permission to collect your location) and the content of your Post.
- provide and improve our advertising services, ad targeting, and ad measurement, including through the use of your precise location information, both on and off our services. We may also store information about your use of third-party apps and websites on your device to do this.
- enhance the safety and security of our products and services.
- verify your identity and prevent fraud or other unauthorized or illegal activity.
- use information we've collected from cookies and other technology to enhance our services and your experience with them.
- enforce, investigate, and report conduct violating our Terms of Service and other usage policies, respond to requests from law enforcement, and comply with legal requirements.

We may also use information from Apple's TrueDepth camera to improve the quality of Posts. Information from the TrueDepth camera is used in real time — we don't store this information on our servers or share it with third parties.

How We Share Information

We may share information about you in the following ways:

- **With other Spotters.** We may share the following information with other Spotters:
 - information about you, such as your username, name, and profile picture.
 - information about how you have interacted with our services, such as your Onspot "score," the names of Spotters you are friends with, how close you are with your friends on Onspot, your recent location history and other information that will help Spotters understand your connections with others using our services. For example, because it may not be clear whether a new friend request comes from someone you actually know, we may share whether you and the requestor have Onspot friends in common.
 - information about your device, such as the operating system and device type, to help you receive Posts and other content in the optimal viewing format.
 - any additional information you have directed us to share. For example, Tech-13 will share your information when you connect your Onspot account to a third-party app, and if you share information or content from Onspot to the third-party app.
 - content you post or send. How widely your content is shared depends on your personal settings and the type of service you are using. For example, a Post may be sent to just for the period of time you select, but your My Spotlight Posts content may be seen by any Spotter, anytime, whom you allow to see your My Spotlight.
- **With all Spotters, our business partners, and the general public.** We may share the following information with all Spotters as well as with our business partners and the general public:
 - public information like your name, username, profile pictures, , and Profile.

- Public Content like your Spotlight, or other submissions that are set to be viewable by Everyone, and any content that you submit to an inherently public service, like Onspot and other crowd-sourced services. This content may be viewed, used, and shared by the public at large both on and off our services, including through search results, on websites, in apps, and in online and offline
- **With our affiliates.** We may share information with entities within the Tech-13 S.A de C.V.. family of companies.
- **With third parties.** We may share information with third parties in the following ways:
 - We may share information about you with service providers who perform services on our behalf, including to facilitate payments and measure and optimize the performance of ads and deliver more relevant ads, including on third-party websites and apps.
 - We may share information about you with business partners that provide services and functionality on our services.
 - We may share information about you, such as device and usage information, to help us and others prevent fraud.
 - We may share information about you for legal, safety, and security reasons. We may share information about you if we reasonably believe that disclosing the information is needed to:
 - comply with any valid legal process, governmental request, or applicable law, rule, or regulation.
 - investigate, remedy, or enforce potential Terms of Service and Community Guidelines violations.
 - protect the rights, property, or safety of us, our users, or others.
 - detect and resolve any fraud or security concerns.

- We may share information about you as part of a merger or acquisition. If Tech-13 S.A de C.V.. gets involved in a merger, asset sale, financing, liquidation or bankruptcy, or acquisition of all or some portion of our business to another company, we may share your information with that company before and after the transaction closes.
- **Non-personal information.** We may also share with third parties that provide services to us or perform business purposes for us aggregated, non-personally identifiable, or de-identified information.

Third-Party Content and Integrations

Our services may contain third-party content and integrations. Examples include third-party integrations in the Camera, third-party games in Chat, and third-party Tech-13 Kit integrations. Through these integrations, you may be providing information to the third party as well as to Tech-13. We are not responsible for how those third parties collect or use your information. As always, we encourage you to review the privacy policies of every third-party service that you visit or use, including those third parties you interact with through our services. You can learn more about third-party services in Onspot [here](#).

How Long We Keep Your Information

Onspot lets you capture what it's like to live in the moment. On our end, that means most Posts published in Onspot will be stored by default in our servers for up to one year. Other content, like My Spotlight posts, are stored for longer.

We store other information for longer periods of time. For example:

- We store your basic account information — like your name, phone number, and email address — and list of friends until you ask us to delete them.
- We store location information for different lengths of time based on how precise it is and which services you use. If location information is associated with a Tech-13 — like those saved to My Spotlight or posted to Onspot — we'll retain that location as long as we store the Post.

If you ever decide to stop using Onspot, you can just ask us to delete your account. We'll also delete most of the information we've collected about you after you've been inactive for a while!

Keep in mind that, while our systems are designed to carry out our deletion practices automatically, we cannot promise that deletion will occur within a specific timeframe. There may be legal requirements to store your data and we may need to suspend those deletion practices if we receive valid legal process asking us to preserve content, if we receive reports of abuse or other Terms of Service violations, or if your account, content created by you, or content created with other users is flagged by others or our systems for abuse or other Terms of Service violations. Finally, we may also retain certain information in backup for a limited period of time or as required by law.

Control Over Your Information

We want you to be in control of your information, so we provide you with the following tools.

- **Access, Correction, and Portability.** You can access and edit most of your basic account information right in our app. We may also reject your request to access or update your personal information for a number of reasons, including, for example, if the request risks the privacy of other users or is unlawful.
- **Revoking permissions.** In most cases, if you let us use your information, you can simply revoke your permission by changing the settings in the app or on your device if your device offers those options. Of course, if you do that, certain services may lose full functionality. For promotional emails and SMS, you may opt out by clicking on the unsubscribe link or similar mechanism as provided.
- **Deletion.** While we hope you'll remain a lifelong Spotter, if for some reason you ever want to delete your account, the app.
- **Advertising Preferences.** We try to show you ads that we think will be relevant to your interests.
- **Communicating with other Spotters.** It's important to us that you stay in control over whom you communicate with. That's why we've built a number of tools that let you indicate, among other things, if you want your Poststo be anonymous, and whether you'd like to block another Spotter from contacting you again.

International Data Transfers

We may collect your personal information from, transfer it to, and store and process it in the United States and other countries outside of where you live. Whenever we share information outside of where you live, when we are legally required to do so, we make sure an adequate transfer mechanism is in place. We also make sure any third parties we share information with have an adequate transfer mechanism in place, as well.

State and Region Specific Information

You may have specific privacy rights in your state or region. For example, in the United States, residents of California and other states have specific privacy rights. Spotters in the European Economic Area (EEA), the UK, Brazil, the Republic of Korea, and other jurisdictions also have specific rights.

Children

Our services are not intended for — and we don't direct them to — anyone under 13. And that's why we do not knowingly collect personal information from anyone under 13. In addition, we may limit how we collect, use, and store some of the information of EEA and UK users between 13 and 16. In some cases, this means we will be unable to provide certain functionality to these users. If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

Revisions to the Privacy Policy

We may change this Privacy Policy from time to time. But when we do, we'll let you know one way or another. Sometimes, we'll let you know by revising the date at the top of the Privacy Policy that's available on our website and mobile application. Other times, we may provide you with additional notice (such as adding a statement to our websites' homepages or providing you with an in-app notification).