

# PRIVACY POLICY

Effective date: October 3, 2021

## 1. Introduction

Welcome to Gyfft LLC. Gyfft LLC (“us”, “we”, or “our”) operates the website [letsjolly.com](https://letsjolly.com) and the Jolly mobile application (hereinafter collectively referred to as “Service”). Our Privacy Policy governs your visit to [letsjolly.com](https://letsjolly.com) and your use of the Jolly mobile application, and explains how we collect, safeguard and disclose information that results from your use of our Service. By using our Service, you agree to the collection and use of your information in accordance with this Policy. Unless otherwise defined in this Policy, the terms used herein have the same meanings as in our Terms and Conditions (“Terms”), which govern all use of our Service and together with this Privacy Policy constitutes your agreement with us (“Agreement”).

## 2. Definitions

- **SERVICE** means the [letsjolly.com](https://letsjolly.com) website and the Jolly mobile application operated by Gyfft LLC.
- **PERSONAL DATA or INFORMATION** means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- **USAGE DATA** is data collected automatically either generated by the use of our Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **COOKIES** are small files stored on your device (computer or mobile device).
- **DATA CONTROLLER** means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purpose of this Privacy Policy, Gyfft LLC is the Data Controller of your data.
- **PROCESSORS (OR SERVICE PROVIDERS)** means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
- **DATA SUBJECT** is any living individual who is the subject of Personal Data.

- **THE USER** is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

### **3. Types of Personal Data Collected**

Gyfft, LLC collects information directly from you, including when you provide information through our website or mobile app or when you correspond with us by email, and from your use of our Service, including information that our Service collects about your interaction with our website and mobile app. Our Service Providers may also collect information about you on our behalf.

We or our service providers collect the following Personal Information:

- **Identifiers**, such as your name, shipping address, telephone number, email address, username, and Internet Protocol address;
- **Payment information**, including name, billing address, bank account number, credit card number, debit card number, or any other financial information;
- **Internet or other electronic network activity information**, including, but not limited to, usage data, browsing history, search history, Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, other diagnostic data, and cookies, or information regarding a consumer's interaction with an Internet Web site, application, or advertisement (see Cookie Policy below);
- **Geolocation data**, which may include precise location information of website visitors and app users.

### **4. Use of Data**

Gyfft LLC uses the collected data for various purposes related to our legitimate business interests, where required by law, or with your consent, including:

- to provide and maintain our Service;
- to notify you about changes to our Service;
- to allow you to participate in interactive features of our Service when you choose to do so;
- to provide customer support;

- to gather analysis or valuable information so that we can improve our Service;
- to monitor the usage of our Service;
- to detect, prevent and address technical issues;
- to detect, prevent, and address error, fraud, property damage, theft, and other security issues;
- to fulfill any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;
- to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you;
- to comply with local, state, and federal laws and to protect the security of your transactions;
- when we are required to do so in order to comply with valid legal processes such as search warrants, subpoenas, or court orders;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

## **5. Cookie Policy**

We use cookies and similar tracking technologies to track the activity on our Service, offer personalization features, and serve targeted ads. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. We also use other tracking technologies like beacons, pixels, tags, and scripts to collect and track engagement information, for example, when we send you an email, and to improve and analyze use of our Service.

We use the following types of cookies:

- Strictly Necessary Cookies to operate our Service;
- Functionality Cookies to remember your preferences and various settings and for security purposes;
- Performance and Analytics Cookies to monitor and analyze the use of our Service. We use Google Analytics, Segment, Mixpanel, and Customer.io. For more information on the privacy practices of these providers, please visit <https://policies.google.com/privacy?hl=en-US>,

<https://segment.com/legal/privacy/>, <https://mixpanel.com/legal/privacy-overview/>, and <https://customer.io/legal/privacy-policy/>, respectively.

- Advertising Cookies to serve you with advertisements that may be relevant to you and your interests (see Behavioral Remarketing below).

## Behavioral Remarketing

Gyftt LLC uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service. Google Ads (AdWords) Google Ads (AdWords) remarketing service is provided by Google Inc.

*Google:* You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>. Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

*Twitter:* Twitter remarketing service is provided by Twitter Inc. You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>. You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

*Facebook:* Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>. To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>. Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

*Pinterest:* Pinterest remarketing service is provided by Pinterest Inc. You can opt-out from Pinterest's interest-based ads by enabling the “Do Not Track” functionality of your web browser or by following Pinterest instructions: <http://help.pinterest.com/en/articles/personalization-and-data>. You can learn more about the privacy practices and policies of Pinterest by visiting their Privacy Policy page: <https://about.pinterest.com/en/privacy-policy>.

*Instagram:* Instagram remarketing service is provided by Facebook. You can opt-out from Instagram's interest-based ads by enabling the “Do Not Track” functionality of your web browser or by following Instagram instructions: [https://www.facebook.com/help/instagram/2885653514995517?locale=en\\_US](https://www.facebook.com/help/instagram/2885653514995517?locale=en_US). You can learn more about the privacy practices and policies of Instagram by visiting their Privacy Policy page: <https://help.instagram.com/519522125107875>.

*Snapchat:* Snapchat remarketing service is provided by Snap, Inc. You can opt-out from Snapchat's interest-based ads by enabling the “Do Not Track” functionality of your web browser or by following Snapchat instructions: <https://support.snapchat.com/en-US/a/advertising-preferences>. You can learn more about the privacy practices and policies of Snapchat by visiting their Privacy Policy page: <https://snap.com/en-US/privacy/privacy-policy>.

*TikTok:* TikTok remarketing service is provided by TikTok. You can opt-out from TikTok's interest-based ads by enabling the “Do Not Track” functionality of your web browser or by following TikTok instructions: <https://support.tiktok.com/en/account-and-privacy/personalized-ads-and-data/personalization-and-data>. You can learn more about the privacy practices and policies of TikTok by visiting their Privacy Policy page: <https://www.tiktok.com/legal/privacy-policy?lang=en>.

## **6. Retention of Data**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **7. Transfer of Data**

Gyftt LLC operates in the United States. When you provide Personal Information to us, you are providing it to us in the United States, where privacy laws may not be as protective as those in your home jurisdiction. Your submission of such information represents your consent to the processing of your information by Gyftt LLC in the United States.

## **8. Disclosure of Data**

We share Personal Information with the following categories of third parties for the following purposes:

- **Disclosure for Law Enforcement.** Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.
- **Business Transaction.** If we or our subsidiaries are involved in a merger, acquisition or asset sale, your Personal Data may be transferred.
- **Payments.** We use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your Personal Information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information. The payment processors we work with are (privacy policies hyperlinked): [Apple Store In-App Payments](#), [Google Play In-App Payments](#), and [Stripe](#).
- **Service Providers.** We may disclose your information also to our subsidiaries and affiliates, contractors, and other third parties we use to support our business and carry out our Services. We may employ third party companies and individuals to facilitate our Service (“Service Providers”), provide Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. We may also disclose your information to these entities to fulfill the purpose for which you provide it, to include your company’s logo on our website, for any other purpose disclosed by us when you provide the information, with your consent in any other cases, and if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the

Company, our customers, or others.

## **9. Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **10. How You Can Control Your Information**

**Opting Out of Marketing Communications.** You may opt out of receiving any, or all, promotional communications from us by following the unsubscribe link in the communication or by managing communications through the mobile app.

**Your Browser Settings.** Your browser may give you the ability to control cookies or other tracking tools. The Help portion of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to delete existing cookies. Note that if you choose to disable cookies, it is possible that some of our websites' features may not function properly. For more information on deleting or controlling cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org).

**Do Not Track Requests.** We honor Do Not Track signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

**Making Changes to Your Information.** To make a request to update your information, please contact us at [support@gyfft.com](mailto:support@gyfft.com).

**California Privacy Rights for California Residents.** If you reside in California, you have the right to ask us one time each year for information identifying any third parties with whom we have shared your Personal Information for their direct marketing purposes. You can also request a description of the categories of personal information disclosed to that third party in the preceding calendar year. To make such a request, please email [support@gyfft.com](mailto:support@gyfft.com). Indicate that you are a California resident making a "Shine the Light" inquiry.

Gyfft LLC does not meet the threshold for applicability of the California Consumer



Privacy Act, Cal. Civ. Code §1798.100 et seq., and is therefore not subject to the requirements of the Act.

### **11. Supplemental Notice for EU/EEA/UK Residents**

If you are a resident of the European Union (EU), the European Economic Area (EEA), or the United Kingdom (UK) you have certain data protection rights, covered by GDPR and UK GDPR, respectively.

You have the right under certain circumstances:

- To be provided with a copy of your Personal Data held by us;
- To request the rectification or erasure of your Personal Data held by us;
- To request that we restrict the processing of your Personal Data (while we verify or investigate your concerns with this information, for example);
- To object to the further processing of your Personal Data, including the right to object to marketing;
- To request that your provided Personal Data be moved to a third party.

Where the Processing of your Personal Data by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us as set forth in the “Contact Us” section below. Such withdrawal will not affect the Processing of your Personal Data prior to the withdrawal.

You can exercise the rights listed above at any time by contacting us at [support@gyfft.com](mailto:support@gyfft.com). The exercise of the above rights might be subject to certain conditions and we might require further information from you before we can respond to your request.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority.

### **12. Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **13. Children's Privacy**



Our Services are not intended for use by children under the age of 18 (“Child” or “Children”). We do not knowingly collect Personal Data from Children under 18. If you become aware that a Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

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

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the “effective date” at the top of this Privacy Policy. Where required by law, we will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### **15. Contact Us**

If you have any questions about this Privacy Policy, please contact us by email at [support@gyft.com](mailto:support@gyft.com).