



iPOLPO Privacy Policy

Last Modified: February 22nd, 2022

When you use the iPOLPO services—and any others we roll out—you will inevitably share some information with us. We understand that this can affect your privacy. So, we want to be upfront about the information we collect, how we use it, whom we share it with, and the choices we give you to control, access, and update your information.

There are three basic ways we collect information:

- **Information you choose to give us.**
- **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 Choose to Give Us

Our iPOLPO app is FREE to browse anonymously. YES, no info is needed for users to download the free app and start browsing all photos posted (all photos are watermarked while browsing).

You will be asked to set up an account only if/when you wish to either download or upload photos. Setting up an iPOLPO account is simple and we only require the following:

- 1) an email that MUST be confirmed
- 2) a secure password (YOUR PASSCODE IS ENCRYPTED WE DO NOT HAVE ACCESS)

“LOCATION TRACKING”

- ONLY YOU (each user) CONTROL THIS TRACKING FEATURE (located within the “accounts” page under “MY PATH”)
- MY PATH “ON” enables iPOLPO to track your path during an event. This feature will track your GPS coordinates and time you were there. This time and location data is then ONLY used by our algorithm to find photos taken at a specific place during the time you were there. Helping you find photos of you. No bib numbers, no facial recognition no photo albums ... simple time and location to find your photos automatically with this feature.
- We encourage all users to turn “OFF” this feature when done participating in specified event.
- By using our Services, you understand and agree that this information will be stored by iPOLPO on your phone/device(for one week only)



- Also, please know that this information is not shared with anyone and is not used for any other purposes.
- Please keep in mind that also YOUR PHONE (separate from iPOLPO) tracks your GPS and it is with this information, that our Services know your “current location”. This feature is adjustable within your smartphone settings and outside of iPOLPO Services.

“PAYMENT AND PURCHASE DETAILS”

iPOLPO DOES **NOT** ASK FOR, OR COLLECT ANY PAYMENT DETAILS.

We rely on the SECURE SYSTEMS of Apple in-app services, Google Pay and PayPal to process all payments and purchases. This is done through the email you provide when setting up account.

To be clear, iPOLPO only has access to your email and no other financial information.

“PHOTOS”

iPOLPO does NOT have access to your photos.

Only you can choose which photos to upload through our services.
ALL UPLOADED PHOTOS MUST BE GEOTAGGED (location coordinates) and TIME STAMPED.

All uploaded photos are available instantly on the iPOLPO APP for registered users and non-account holders to browse. Only those registered with our app are able to purchase and download.

Although watermarked, all photos can be screen-captured (with watermarks) and saved or copied outside the iPOLPO app. So, the same common sense that applies to the internet at large, applies to iPOLPO: **Don't upload photos that you may later decide not to have public.**

If you find any photos on our iPOLPO platform that you wish to have removed for any reason we have provided a red flag icon in the upper right corner of every photograph to allow for easy REPORT A PHOTO feature.

iPOLPO IS ANONYMOUS and we will not publicly display your username or identity.
HOWEVER, iPOLPO will comply with all laws and regulations or any ongoing investigations.

PLEASE ALSO NOTE

When you contact iPOLPO Support or communicate with us in any other way, we will privately collect whatever information you volunteer and use this info to improve our user experience.



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.

- **Usage Information.** We collect information about your activity through our services. For example, we may collect information about:
 - how you interact with the services, such as which filters you view or apply to “find photos” or which search queries you submit.
- **Content Information.** We collect information about the content/ photos you provide/upload to sell, such as if the location and time (the metadata) of all photos and asking price. As well as how often (if any) a photo has been viewed, by what users and if it has been purchased.
- **Device Information.** We reserve the right to collect device-specific information, such as the hardware model, operating system version, advertising identifier, unique application identifiers, unique device identifiers, browser type, language, wireless network, and mobile network information (including the mobile phone number).
- **Camera and Photos.** Many of our services require us to collect images and other information from your device's camera and photos.

iPOLPO WILL ACCESS YOUR CAMERA AND PHOTOS ONLY AFTER YOU GIVE US YOUR CONSENT.

- **Location Information.** When you use our services we may collect information about your location. With your consent, 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.
- **Log Information.** We also reserve the right to collect log information when you use our website. This information may include, among other things:
 - details about how you've used our services
 - device information, such as your web browser type and language
 - access times
 - photos viewed
 - IP address
 - identifiers associated with cookies or other technologies that may uniquely identify your device or browser

Information We Collect from Third Parties

We may collect information about how other users interact with you when they use our services. For example, how often a user views and buys a specific photo or how often your photos are flagged.



How We Use Information

What do we do with the information we collect? iPOLPO mainly collects data to improve the user experience. iPOLPO is a photo-sharing market place that does not rely on selling ads or user information, therefore the data collected is for the main purpose to help users sell and buy photos. But in future, we plan to do a lot more, such as:

- develop, operate, improve, deliver, maintain, and protect our users, products and services
- communicate with you
- monitor and analyze trends and usage
- potentially personalize the services by, customizing the content we show you and suggesting photos of interest (amongst other things)
- enhance the safety and security of our products and services
- verify your identity and prevent fraud or other unauthorized or illegal activity
- enforce our Terms of Service and other usage policies

Also, so that you can open the app and view content faster, we may store some information locally on your device. For example, we may store information as local cache.

How We Share Information

We may share information about you in the following ways:

- **With other iPOLPO users** we may share the following information:
 - any information you have consented for us to share. For example, when extra features are added to “profile” pages
 - content you upload (PHOTOGRAPHS) that we will watermark and make available for viewing by iPOLPO users and visitors, sorted by simple time and location
- **With all iPOLPO users and the general public.** We may share the following:
 - public information like your watermarked uploaded photos;
- **With third parties.** We may share your information with the following third parties:
 - **With service providers, sellers, and partners.** We may share information about you with service providers who perform services on our behalf, sellers that provide goods through our services, and business partners that provide services and functionality.
 - **With third parties for legal reasons.** We may share information about you if we reasonably believe that disclosing the information is needed to:
 - comply with any valid legal process, government request, or applicable law, rule, or regulations;
 - investigate, remedy, or enforce potential Terms of Service violations;
 - protect the rights, property, and safety of us, our users, or others; or
 - detect and resolve any fraud or security concerns.



- **With third parties as part of a merger or acquisition.** If iPOLPO 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. Prior notice will be given to you before any such action is taken.
- **In the aggregate or after de-identification.** We may also share with third parties, such as advertisers, aggregated or de-identified information that cannot reasonably be used to identify you.

Information You Choose to Share with Third Parties

In future, our services may also contain third-party links and search results, include third-party integrations, or be a co-branded or third-party-branded service that's being provided jointly with or by another company. By going to those links, using the third-party integration, or using a co-branded or third-party-branded service, you may be providing information (including personal information) directly to the third party, us, or both. You acknowledge and agree that 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 website or service that you visit or use, including those third parties you interact with through our services.

How Long We Keep Your Content

Currently, iPOLPO stores all uploaded photographs indefinitely, but we reserve the right in future to delete images annually to make room for new more current events and allow for our system to function fast and efficiently. We will notify our users with any such changes.

THIS IS IMPORTANT—you should understand that Users who see the content you provide can always save it using any number of techniques: screenshots (only with watermark) or any other image-capture technology available outside of our Services.

It's also possible, as with any digital information, that someone might be able to access photos forensically or find them in a device's temporary storage.

Also please keep in mind that, within the current iPOLPO service, when a Seller/photograph maker deletes a photo that they have uploaded, the photo will instantly no longer be available on the iPOLPO map search. However, if another user has already purchased the same photo (before deletion), a copy of this photo remains on the server to be available for download by the Buyer and it remains there indefinitely. iPOLPO cannot refund any sale therefore once purchased, the buyer has access to the image (please see "YOUR CONTENT" paragraph #2).

To be clear, **DO NOT UPLOAD ANY PHOTO THAT YOU MAY WANT TO COMPLETELY DELETE IN THE FUTURE.** iPOLPO is a web-based service and content may migrate to



outside the iPOLPO services. iPOLPO may also retain certain information in backup for a limited period of time as required by law.

iPOLPO therefore may not be held responsible if “deleted” photos reappear after deletion, or if any of the above pirated techniques of acquiring uploaded photos outside our Services occurs.

Control over Your Information

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

- **Access and Updates.** We strive to let you access and update most of the personal information that we have about you. There are limits though to the requests we'll accommodate. We may reject a request for a number of reasons, including, for example, that the request risks the privacy of other users, requires technical efforts that are disproportionate to the request, is repetitive, or is unlawful. You can access and update most of your basic account information right in the app by visiting the app's Settings page or on our website www.iPOLPO.com. If you need to access, update, or delete any other personal information that we may have, you can put in a request at help@ipolpo.com. Because your privacy is important to us, we may ask you to verify your identity or provide additional information before we let you access or update your personal information. We will try to update and access your information for free, but if it would require a disproportionate effort on our part, we may charge a fee. We will of course disclose the fee before we comply with your request.
- **Revoking Permissions.** If you change your mind about our ongoing ability to collect information from certain sources that you have already consented to, such as your camera, photos, or location services, you can simply revoke your consent by changing the settings on your device if your device offers those options. Of course, if you do that, certain services may lose full functionality.
- **Account Deletion.** While we hope you'll remain a lifelong iPOLPO user, if for some reason you ever want to delete your account, you can anytime. If you ask to delete your account, you will have up to 30 days to restore your account before we delete your information from our servers. During this period of time, your account will not be visible to other iPOLPO users however your previously uploaded photos that have been placed into user carts for purchase will remain available for purchase.

Analytics and Advertising Services Provided by Others

In the future, iPOLPO may let other companies use cookies, web beacons, and similar tracking technologies on the services. These companies may collect information about how you use the services and other websites and online services over time and across different



services. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

Users Outside Canada and the United States

Although we welcome iPOLPO users from all over the world, keep in mind that no matter where you live or where you happen to use our Services, we operate our Services from Canada & United States. This means that we may collect your personal information from, transfer it to, and store and process it in Canada &/or United States and other countries whose local data-protection and privacy laws may offer fewer protections than those in your country of residence or from any country where you use or access the services.

iPOLPO is NOT intended for Children

Our services are not intended for—and we don't direct them to—anyone under 15. And that's why we do not knowingly collect personal information from anyone under 15. **Anyone 15 to 17 years of age MUST have permission from their legal guardian to use this site.**

If you are uploading/ selling photos and would hesitate to show your photos to a child, your family, or a stranger on the street, that means you probably should NOT upload that photo onto iPOLPO. Please be responsible.

Revisions to the Privacy Policy

We may change this privacy policy from time to time. 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).

PLEASE ONLY USE iPOLPO IF YOU AGREE WITH AND CONSENT TO ALL OF THE ABOVE TERMS & CONDITION. WE HOPE YOU ENJOY THE SERVICES AND USE THEM IN A POSITIVE MANNER.

IF YOU HAVE QUESTIONS, PLEASE CONTACT US AT: HELP@IPOLPO.COM