

SWORDPOINT PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY STATEMENT CAREFULLY. YOU MUST BE AT LEAST EIGHTEEN YEARS OF AGE TO USE THE SWORDPOINT SERVICES.

This privacy policy statement ("**Privacy Policy**") explains how Swordpoint Services, LLC, a Georgia limited liability company, and/or its subsidiary and affiliated entities (collectively, "Swordpoint", "**we**", "**us**", or "**our**") may collect information about you through the Swordpoint services, including its mobile application WINGEN, and its other websites, SMS, APIs, and email notifications, that are operated by Swordpoint and link to this Privacy Policy (collectively, the "**Services**") and how this information may then be used, shared, disclosed, transferred, and/or stored.

The Services expressly include any Swordpoint or WinGEN top-level-domain as well as any re-directs to Swordpoint branded areas and sub-domains of third-party websites (as such websites and top-level-domains may be renamed from time to time). This Privacy Policy does not apply to those portions of the Services that do not display or link to this Privacy Policy or that have their own privacy policy statement or to information we may collect from you or about you in other ways, including through emails, texts and/or phone calls you may send and/or make to us. We may update this Privacy Policy from time to time by posting the updated terms on the Services (including on our mobile applications and/or websites). You are responsible for periodically reading this Privacy Policy. If you register, subscribe, create an account, participate in an online survey, or otherwise interact or access the Services after we have updated this Privacy Policy, you acknowledge that you have read the updated terms and consent to our revised privacy practices.

This Privacy Policy describes our privacy practices, including what information we may collect from you through the Services, and what we may then do with this information.

YOU MUST BE AT LEAST EIGHTEEN YEARS OF AGE TO USE THE SWORDPOINT SERVICES.

We encourage parents and legal guardians to talk about what information their children should and shouldn't share online and/or through mobile application, and other restrictions about the online and mobile application release of Personal Information (as hereinafter defined) to anyone they don't know. We hope that our privacy practices as described in this Privacy Policy will remove any concerns that parents and legal guardians may have about their children visiting or using the Services.

We do not intentionally gather Personal Information about visitors who are under the age of 18.

By using the Services, you acknowledge that you have read this Privacy Policy and consent to our privacy practices as described in this statement, including our use and disclosure of your Personal Information to the Retailers that we serve for the purposes described below. You further affirm your consent by becoming a registered member and/or account holder of Swordpoint or submitting content or materials to or through the Services. This Privacy Policy is not intended to and does not create any contractual or other legal right in or on behalf of any person.

Residents of the State of California, please also read the *California Residents - Your Privacy Rights* section below to understand additional rights you may have pursuant to California Civil Code Section 1798.83.

IF YOU DO NOT CONSENT TO OUR PRIVACY PRACTICES AS DESCRIBED IN THIS PRIVACY POLICY, PLEASE

DO NOT REGISTER, SUBSCRIBE, CREATE AN ACCOUNT, PARTICIPATE IN AN ONLINE SURVEY, OR OTHERWISE INTERACT OR ACCESS THE SERVICES.

IF YOU ENCOUNTER A SCREEN OR PAGE THAT REQUESTS INFORMATION YOU DO NOT WANT TO SHARE WITH US, DO NOT ENTER THE INFORMATION AND DO NOT PROCEED WITH THAT SCREEN OR PAGE.

INFORMATION WE MAY COLLECT THROUGH THE SERVICES

This Privacy Policy only applies to information that we collect through the Services and does not apply to any information we collect through any other means.

COLLECTION AND USE OF PERSONAL INFORMATION

Personal information (“**Personal Information**”) is information that can be used to identify, locate, or contact a single person, such as a person’s name, address, telephone number, or email address. It also includes other information that may be associated with Personal Information.

You may be asked to provide your Personal Information anytime you register, subscribe, create an account, purchase a product or service from one of the retailers that we serve participate in an online survey, or otherwise interact with or access the Services or are in contact with us. We may share this Personal Information with and use it consistent with this Privacy Policy. We may also combine it with other information to provide and improve our products, services, content, and advertising.

Here are some examples of the types of Personal Information we may collect and how we may use, share, disclose, transfer and store it.

WHAT PERSONAL INFORMATION WE MAY COLLECT

- When you register, subscribe, create an account, participate in an online survey, or otherwise interact or access the Services or are in contact with us, we may collect a variety of information, including your first and last name, zip code, mailing address, phone numbers, email addresses, other addresses at which you receive communications from or on behalf of Swordpoint, social media website user account names, and contact preferences.
- When you share your content with others our services we may collect the information you provide about those people such as first and last names, mailing addresses, email addresses, and phone numbers.
- We may collect information that helps us to understand who you are and what types of products, services and offers you might like. This information includes lifestyle information; location information related to your state/province, city, or neighborhood; areas of interest, the types of products and services that you may be interested in Purchasing, services and offers that interest you, information collected from social media interactions; demographic information (e.g., birth date, age, gender); information about persons for whom you have purchased our products, or information about friends who refer you or who you have referred.
- We may collect information about how you interact with certain retailers, such as the products, services, offers and or sub-domains you view, purchase and redeem; other information about; and how you interact with our other users, merchants, business partners, and Service Providers (as hereinafter defined).

HOW WE MAY USE YOUR PERSONAL INFORMATION

If you do provide us with Personal Information, we may use it for the purposes described in this Policy Statement or where it is collected. Primarily, we use Personal Information to:

- develop, deliver, and improve our products, services, content, and advertising;
- create and publish content on or through the Services;
- register you as a member and/or account holder and develop your profile and enable you to take advantage of the features of the Services;
- alert you to announcements, special offers, upcoming events, updated information, and new products and services or certain retailers;
- send important notices, such as communications about purchases and changes to our terms, conditions, and policies;
- send you reminders, technical notices, updates, security alerts and support and administrative messages service bulletins, or marketing;
- forward promotional materials and to fulfill the terms of such promotion;
- target the Services of retailers from whom you may purchase goods and services;
- manage our everyday business needs such as Services administration (including administration of our mobile applications and websites), forum management, fulfillment, analytics, fraud prevention, enforcement of our corporate reporting obligations, [Terms and Conditions](#) or to comply with the law;
- perform auditing, data analysis, and research to improve our products, services, and customer communications;
- provide advertisements to you through the Services, email messages, text messages, voicemail messages, applications, or other methods of communication;
- administer surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our partners and to administer such activities or events;
- identify you as a poster or provider of content; and
- contact you in response to sign up forms such as “Contact Us” and “Sign Up”.

WHEN AND WHY WE MAY SHARE, DISCLOSE, TRANSFER AND STORE PERSONAL INFORMATION

If you do provide us with Personal Information, we may share, disclose, transfer and store it for the purposes described in this Policy Statement or where it is collected. Primarily, we share, disclose and transfer Personal Information to:

- Affiliated companies (e.g., subsidiaries and retailers with whom you may buy goods and services
- Our Service Providers, agents, and independent contractors that provide products and services to and for us such as sending texts, emails, and voicemails; information processing; maintaining the Services (including maintaining our mobile applications and websites); fulfilling customer orders; delivering products and services to you; managing and enhancing customer data;

providing customer service; sending customer communications on our behalf; assessing your interest in our products and services; conducting customer research or satisfaction surveys; and processing payments. Also, if you are entering a sweepstakes or contest, we may use your Personal Information to fulfill the terms of that promotion, including for prize fulfillment purposes or with mail carriers (including sharing and disclosing your Personal Information with co-sponsors of such promotion).

- Our affiliates, strategic partners, agents, third-party marketers and other unaffiliated parties so that they may offer you products and services that we believe may be of interest to you, or to assist such parties for research, administrative, and/or business purposes. These parties may contact you with an offer or advertisement related to a product or service, or they may use such information for their own research, administration or business purposes.
- Third-parties to comply with law, or in the good faith belief that such action is necessary to conform to the requirements of law, or comply with legal process served on us, and to protect and defend our rights or property, including our rights and property on the Services, or act in urgent circumstances to protect the personal safety of you and our other visitors.
- Third-parties as part of a corporate reorganization process including, but not limited to, mergers, acquisitions, and sales of all or substantially all of our assets.
- Third-parties to track and analyze non-identifying, aggregate usage and volume statistical information from our visitors and customers and provide such information to third-parties.
- Third-parties to protect against fraud and potential fraud.
- Third-parties to help us verify the information on the Services. In the course of such verification, we may receive additional Personal Information about you from such services.

We seek to ensure that any unaffiliated third-parties will not use your Personal Information for any purpose other than that for which they are responsible. However, we cannot guarantee that they will not use it for any other purpose.

COLLECTION AND USE OF NON-PERSONAL INFORMATION

We may also collect non-Personal Information and data in a form that does not permit direct association with any specific individual, including technical information; demographic information (such as your age, gender, or interests); your activity on the Services; and information such as your occupation, language, zip code, area code, unique device identifier, location, and the time zone where you use or receive a product or service (collectively, “**Non-Personal Information**”).

Here are some examples of the types of Non-Personal Information we may collect and how we may use, share, disclose, transfer and store it.

WHAT NON-PERSONAL INFORMATION WE MAY COLLECT

Internet Protocol (IP) address. Your “IP address” is a number that lets computers attached to the Internet know where to send you data, such as the screens and pages of the Services that you view. We use this information to deliver our screens and pages to you upon request, to tailor the Services to the interests of you and our other visitors, and to measure traffic to and within the Services.

- *Cookie.* A “**cookie**” is a small text file that may be used to collect information about your activity on the Services. For example, when you visit a screen or page on the Services, a cookie is placed

on your mobile device, computer, tablet or other machine (if you or your browser accept the cookie). This cookie may then be read by screen or pages on the Services. You may configure or instruct your browser to notify you or to reject and block cookies, but if you do (or if you do not accept cookies), you may not have access to some areas of the Services, or to the personalized features of the Services. Examples of Cookies we use:

- * *Session Cookies*. We use Session Cookies to operate the Services.
- * *Preference Cookies*. We use Preference Cookies to remember your preferences and various settings.
- * *Security Cookies*. We use Security Cookies for security purposes.
- * *Advertising Cookies*. Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.
- *Web Beacon*. A “**web beacon**”, “**clear gif**”, “**web bug**”, or “**pixel tag**” is a tiny graphic file with a unique identifier, that is similar in function to a cookie, but allows us to count the number of users that have visited certain pages or screens of the Services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, web beacons can tell the sender whether and when the email has been opened. In contrast to cookies, which may be stored on your computer’s hard drive, web beacons are typically embedded invisibly on pages or screens.

In some of our email and text messages, we use a “click-through URL” linked to content on the Services and/or third-party websites. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on the Services and/or a third-party’s website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email or text messages.

You can enable or disable location services when you use the Services at any time, through your mobile device, computer, tablet or other machine settings.

HOW WE MAY USE, SHARE, DISCLOSE, TRANSFER AND STORE YOUR NON-PERSONAL INFORMATION

Non-Personal Information does not identify you personally. If you do provide us with Non-Personal Information, we may collect, use, share, disclose, transfer and store it for any purpose.

Aggregated data is considered Non-Personal Information for the purposes of this Privacy Policy. If we do combine Non-Personal Information with Personal Information the combined information will be treated as Personal Information for as long as it remains combined.

INTERNATIONAL TRANSFER OF INFORMATION

We may transfer information that we collect about you, including Personal Information, to subsidiary and affiliated entities, or to other third-parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring information about you, including Personal Information, to a country and jurisdiction that does not have the same data protection laws as the European Union, and you consent to:

- the transfer of information about you, including Personal Information, to the U.S.; and
- the use and disclosure of information about you, including Personal Information, as described in this Privacy Policy.

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are from the European Economic Area (EEA), Sworpoint's legal basis for collecting and using the Personal Information described in this Privacy Policy depends on the Personal Information we collect and the specific context in which we collect it.

Sworpoint may process your Personal Information because:

- We need to perform a contract with you;
- You have given us permission to do so;
- The processing is in our legitimate interests and it's not overridden by your rights; or
- To comply with the law.

RETENTION OF DATA

Sworpoint will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information 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.

Sworpoint will also retain data collected automatically either generated by the use of the Services or from the Services infrastructure itself (collectively, "**Usage Data**") for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the Services, or we are legally obligated to retain this data for longer time periods.

TRANSFER OF DATA

Your information, including Personal Information, may be transferred to, and maintained on, computers and/or servers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside of the United States and choose to provide information to us, please note that we transfer the data, including Personal Information, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Sworpoint will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

DISCLOSURE FOR LAW ENFORCEMENT

Under certain circumstances, Swordpoint may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

LEGAL REQUIREMENTS

Swordpoint may disclose your Personal Information in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of Swordpoint;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public; or
- To protect against legal liability.

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 Information, we cannot guarantee its absolute security.

“DO NOT TRACK” SIGNALS UNDER CALIFORNIA ONLINE PRIVACY PROTECTION ACT (CALOPPA)

We do not support Do Not Track (“DNT”). 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 mobile device and/or web browser.

YOUR DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Swordpoint aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information.

If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please [contact us](#).

In certain circumstances, you have the following data protection rights:

- *The right to access, update or to delete the information we have on you.* Whenever made possible, you can access, update or request deletion of your Personal Information directly within your account settings section. If you are unable to perform these actions yourself, please [contact us](#) to assist you.
- *The right of rectification.* You have the right to have your information rectified if that information is inaccurate or incomplete.
- *The right to object.* You have the right to object to our processing of your Personal Information.
- *The right of restriction.* You have the right to request that we restrict the processing of your

Personal Information.

- [The right to data portability](#). You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- [The right to withdraw consent](#). You also have the right to withdraw your consent at any time where Swordpoint relied on your consent to process your Personal Information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

ACCESS TO INFORMATION AND PARENTAL ACCESS

As a registered member or account holder of Swordpoint, you can review and update your profile at anytime by logging-in and visiting your personal account.

In addition, a parent or legal guardian can review or request deletion of any Personal Information we have about their child, or request that there be no further collection or use of their child's information, by [contacting us](#). We take steps to verify the identity of anyone requesting information about a child, to ensure that the person is in fact the child's parent or guardian, and appreciate your cooperation with those steps. The Services are not directed at any person under the age of 18.

If you are a parent or guardian and you are aware that your child has created an account that you have not consented to, please [contact us](#) so that we can take steps to terminate your child's account with us. If you are a parent or guardian and you are aware that that we have collected Personal Information from your child without your consent, please [contact us](#) so that we can take steps to remove that information from our servers.

OPT-OUT

We may communicate with our registered members and account holders via email. For example, we may use your email address to confirm and to send notices and other disclosures as required by law. Generally, users cannot opt-out of these communications, but they will be primarily informational in nature rather than promotional.

However, we do provide you with the opportunity to opt-out of:

- receiving other types of communication from us, such as emails, texts, updates or other communications regarding new services and products offered on or through the Services and any new features or services on the Services;
- sharing or disclosing your Personal Information with third-parties.

You may exercise your opt-out by [contacting us](#). We will process your unsubscribe as soon as possible, but please be aware that in some circumstances you may receive a few more messages until your request is processed. You also may opt-out of receiving such emails by clicking on the "unsubscribe" link within the text of the applicable email or text.

SERVICE PROVIDERS

We may employ third-party companies and individuals to facilitate the Services ("**Service Providers**"), to provide the Services on our behalf, to perform Services-related services or to assist us in analyzing how the Services are used.

These third-parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

ANALYTICS

We may use third-party Service Providers to monitor and analyze the use of the Services.

- **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of the Services. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

ADVERTISING

We may use third-party Service Providers to show advertisements to you to help support and maintain the Services.

- **Google AdSense DoubleClick Cookie**

Google, as a third-party vendor, uses cookies to serve ads on the Services. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to the Services or other websites on the Internet. You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: <http://www.google.com/ads/preferences/>.

- **AdMob by Google**

AdMob by Google is provided by Google Inc. You can opt-out from AdMob by Google service by visiting: <https://support.google.com/ads/answer/2662922?hl=en>. For more information on how Google uses the collected information, please visit the "How Google uses data when you use our partners' sites or app" page: <http://www.google.com/policies/privacy/partners/> or visit the Privacy Policy of Google: <http://www.google.com/policies/privacy/>.

- **Bing Ads**

Bing Ads is an advertising service provided by Microsoft, Inc. You can opt-out of Bing Ads by visiting: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>. For more information about Bing Ads, please visit their Privacy Policy: <https://privacy.microsoft.com/en-us/PrivacyStatement>.

THIRD-PARTY WEBSITES AND ADVERTISERS

The Services may contain links to third-party websites. While we endeavor to work with third-parties that share our respect for user privacy, we are not responsible for the websites or privacy practices of

such third-parties. We may also use third-party advertisers, ad networks, and other advertising, marketing, and promotional companies, to serve advertisements on the Services. Such third-parties may gather information about your visit to the Services or other third-party websites and applications, monitor your access to or market products or services to you, monitor the ads you view, click-on, or interact with, when they were delivered, and the screens and pages that they are on.

We do not endorse these parties, their content, or any products and services they offer. You are responsible for knowing when you are leaving the Services to visit a third-party website or application, and for reading and understanding the terms of use and privacy policy statements for each such third-party.

PROTECTION OF INFORMATION

No data transmissions over the Internet are completely secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us or others over the Internet. You transmit such information at your own risk.

Once we receive your transmission, we make reasonable efforts to ensure the security of our systems. We use firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of such firewalls or secure server software.

If we learn of a breach of our security system or processes, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Services, or providing Personal Information to us through them, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. In the event of a breach, we may post a notice on the Services or send you an email or text at the email address and/or mobile phone number you provided.

YOU MAY HAVE ADDITIONAL RIGHTS TO RECEIVE WRITTEN NOTICE OF SECURITY BREACHES UNDER APPLICABLE LAW OF YOUR JURISDICTION.

You can also help us protect information about you by:

- using only secure web browsers;
- employing common anti-virus and anti-malware tools on your system to keep it safe;
- carefully logging out after using the Services;
- using a strong password with a combination of letters and numbers;
- changing your password often; and
- by [contacting us](#) if you feel your login and/or password have been compromised.

ASSIGNMENT

You consent to our assignment of your account and the information we have about you, including Personal Information, in the event that all or part of our assets are sold or acquired by another party, including all or substantially all of the Services or our top-level-domain, or in the event of a merger for the same.

TERMS AND CONDITIONS

Please read our [Terms and Conditions](#) to understand the terms that apply to your use of the Services. By using the Services, you acknowledge that you have read our [Terms and Conditions](#) and consent to them. You further affirm your consent by creating an account with us or submitting content or materials to or through the Services.

PRIVACY QUESTIONS

If you have any questions or concerns about Swordpoint's Privacy Policy or data processing, please [contact us](#).

- By email: support@wingenapp.com
- By visiting our website: www.wingenapp.com

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. We will let you know via email and/or a prominent notice on the Services, prior to the change becoming effective and update the "effective date" set forth below in this Privacy Policy. 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.

This Privacy Policy is effective as of, and was last updated and posted on, February 22, 2019.

California Residents – Your Privacy Rights

(As provided by California Civil Code Section 1798.83)

A California resident who has provided Personal Information to a business with whom he/she has established a business relationship for personal, family, or household purposes ("**California customer**") is entitled to request information about whether the business has disclosed Personal Information to any third-parties for the third-parties' direct marketing purposes. In general, if the business has made such a disclosure of Personal Information, upon receipt of a request by a California customer, the business is required to provide a list of all third-parties to whom Personal Information was disclosed in the preceding calendar year, as well as a list of the categories of Personal Information that were disclosed.

However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy statement) a policy of not disclosing customer's Personal Information to third-parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of Personal Information and providing a cost free means to exercise that right.

As stated in our privacy policy statement, we do not share information with third-parties for their direct marketing purposes unless you affirmatively agree to such disclosure -- typically by opting-in to receive information from a third-party. To prevent disclosure of your Personal Information for use in direct marketing by a third-party, do not opt-in to such use when you provide Personal Information on, to or

through the Services. Please note that whenever you opt-in to receive future communications from a third-party, your information will be subject to the third-party's privacy policies and practices. If you later decide that you do not want that third-party to use your information, you will need to contact the third-party directly, as we have no control over how third-parties use information. You should always review the privacy policies and practices of any party that collects your information to determine how that entity will handle your information.

California customers may request further information about our compliance with this law by [contacting us](#). Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.