



SESSIA PRIVACY POLICY

INTRODUCTION

In general, we only collect information that allows us to provide you with our best Services. This includes, for example, simple tasks like allowing other users to see your profile - the name, picture, phone number, email you choose to show. It also helps us to keep our Services clear of fraud and spam, and it allows us to get a unique understanding of what additional services may be useful to you, and all other purposes set out in this policy below.

SCOPE AND CONSENT

By using our Services, you allow us to collect, use, disclose, and retain your personal information and other information but we will never read or listen to the content you are sharing privately. You can be sure that we will only use your information as described in this Policy.

INFORMATION WE COLLECT

Registration and Account Information

When you use our various Services you voluntarily give us personal information (e.g., name, email, birth date, age, phone number) and you are not anonymous to us. That means your name, photo, phone number, and email address (if you choose to provide them) will be visible to other users. When you install the App, you'll also be asked to allow us access to your mobile device's address book. A copy of the phone numbers and names of all your contacts (whether they're Sessia members or not – but only name and phone number) will be collected and stored on our servers in order for us to be able to enable you and your contacts to connect. We also ask you to provide us with your ID details, in accordance with the terms of the Sessia User Agreement, by sending a scanned copy of your ID to _____, or by downloading a scanned copy of your ID in the Sessia App, if this function is available in the user's country.

ACTIVITY INFORMATION

While using the Sessia Services, we will collect, and other users can see information on rating and status of the companies connected to Sessia. We will also receive and show information on posts, that you liked, your comments, and purchases that have been made via our purchase service. Additionally, we collect, but do not show to other users information on calls that have been made via the Sessia App.



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INFORMATION FROM OTHER SOURCES

The information we collect may be combined with information from outside records (e.g. demographic information and additional contact information) that we have received in accordance with the law.

ADDITIONAL INFORMATION

We collect additional information when you access our App through a certain device (e.g. your mobile device's unique identifier; information about your device's model and operating system).

USES AND RETENTION

Our mission is to constantly improve our Services and provide you with new opportunities. As part of this mission, we use your information for the following purposes:

1. **Make our service available**

We use your Registration and Account information to (i) register you for the App and create your Sessia User Account; (ii) create your profile and make it visible; (iii) provide customer service, give you information about your account, and respond to your requests; (iv) personalize your experience by providing content (such as posts in the feed) on the Service, (v) indicate which of your contacts is already using Sessia.

2. **Improve our Services**

We use information about Service usage to better understand network behavior and trends, detect potential outages and technical issues.

3. **Process Your Payments**

We may use your information like your name, phone number or account information to process your payments for purchases in our partners' shops, shown in Sessia with the use of bonuses and rewards; payments, connected with your bank accounts and bank cards we carry out through a secured third-party service provider.

4. **Prevent Fraud & Spam; enforcement of law**

We control SPAM and illegal content in order our users to feel safe. We may use your information to prevent, detect, and investigate fraud, security breaches, potentially prohibited or illegal activities, protect our trademarks. This may include URLs included in messages, which were reported as SPAM by



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other users, or were otherwise suspected to be unsolicited and using your operating system authentication services. We may use automated decisions to close an account based on such data and other logic we have created for this, in order to protect other users and prevent recurring breaches. If your account has been blocked you can contact our support. We may use your information and information about your activity to comply with applicable laws.

5. **Communicate With You**

As part of the Sessia family, we want to keep in touch with you. We use your information to contact you (via message or other means) to maintain the App and to provide you with correct interaction

DATA RETENTION

Unless otherwise specified, we retain information as long as it is necessary and relevant for us to achieve the purposes referred to above or to enable us to comply with our legal data protection retention obligations. Upon deactivation of your account, we will minimize the personal data we keep about you only to such data which we are required to keep to comply with laws, or other legal reasons. We may keep activity data on a non-identifiable basis to improve our services. Your posts on public accounts and communities may remain available if you do not delete them.

DISCLOSURE

Your data is kept safe with us, but we do share your personal information with third parties we trust in order to provide you with our services, as follows:

1. **Suppliers of goods from Sessia shops, payment services and other third-parties**

We may disclose your information to service providers and other third-parties under contract who help with providing you and others our Services on our behalf or other services provided by third-parties via Sessia Services (such as, but not limited to, fraud and spam investigations, payment processing, site analytics and operations, providing special partnership features in our service—either on an aggregate non identifiable basis, or using a unique identifier which is not attributable to you). They are required to secure the data they receive.



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2. **Legal and Law Enforcement**

We may disclose your information to law enforcement, governmental agencies, or authorized third-parties, in response to a verified request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other Sessia user to legal liability

3. **Change of Control - New Owners**

We may share your information with another business entity, if we plan to merge with or be acquired by that business, or are involved in a transaction with similar financial effect. In such a situation we would make reasonable efforts to request that the new combined entity or other structure follow this Policy with respect to your personal information. If your personal information was intended to be used differently, we would ask the new entity to provide you with prior notice.

INFORMATION YOU SHARE PUBLICLY

Some of our Services allow you to share information with others on a public basis. If you post information on social media sites, plug-ins or other applications, do not forget this information is public on our Services and, depending upon your privacy settings, may also become public on the Internet. Some social networks allow you to control what data you share through privacy settings. Please refer to those third-party sites' privacy policies and terms of use to learn more about their privacy practices, as we do not control these.

COOKIES AND TRACKING TECHNOLOGIES

When you log-in our App, we encourage you to give consent to use cookies and other tracking technologies for a variety of purposes. We offer some functions that can be available only if using tracking technologies. We use tracking technology during the session and permanent tracking technology. Tracking technology (Cookie files) may be permanent (i.e. files used by those are stored till deletion) or temporary (i.e. files are stored until the browser is closed or the App is exited). You can waive the usage of tracking technologies, if your browser supports such option, however, you may encounter difficulties using the App or website. We recommend you get acquainted with your browser's manual, browser's add-ons or installed apps, to get instructions how to block, delete or turn off such tracking technologies as Cookie files. Sessia uses secure and encrypted tracking technologies, so that only Sessia can



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interpret the data they collect. Tracking technologies or Cookie files used by third parties can also be used such as those that received access to the different aspect and operations of the App, such as Google Analytics.

SPECIFIC LOCATION PRACTICES

Specific practices for the residents of California (the USA) and EEA residents

California Privacy Rights (the USA)

Residents of the State of California (the USA) can request a list of all third-parties to which our App has disclosed certain personal information (as defined by California law) during the preceding year for those third-parties' direct marketing purposes. If you are a California resident and want such a list, please contact us at _____. For all requests, please ensure you put the statement "Your California Privacy Rights" in the body of your request, as well as your name, street address, city, state, and zip code. In the body of your request, please provide enough information for us to determine if this applies to you. You need to attest to the fact that you are a California resident and provide a current California address for our response. Please note that we will not accept requests via the telephone, mail, or by facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information. Sessia does not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

EEA Privacy Rights

If you use our services from the EEA, you have certain rights regarding your personal information, subject to local law. These include the following rights to: access your personal information, rectify the information we hold about you, erase your personal information, restrict our use of your personal information, object to our use of your personal information, receive your personal information in a usable electronic format and transmit it to a third party (right to data portability), lodge a complaint with your local data protection authority. To learn more about exercising your EEA rights, visit our EEA rights page. If you would like to understand or exercise such rights, please contact us at the details below. We will contact you if we need additional information from you in order to honor your requests.



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We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- to fulfill our contractual obligations to you, for example to provide the services, to ensure that invoices are paid correctly.
- your consent to the processing.
- to comply with our legal obligations, as explained above.
- to meet our legitimate interests, for example to understand how you use our products services and to enable us to derive knowledge from that, which allows us to develop new products and services, and to personalize the service for you and the ads you see. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.
- to protect the vital interests of the data subject or of another natural person.
- necessity for the performance of a task carried out in the public interest.

We may obtain your consent to collect and use certain types of personal information when we are required to do so by law (for example, in relation to Cookies and Tracking Technologies or when we process accurate location data for purposes other than performing the service). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice or email _____. We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate. We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your data protection authority or to the data protection authority of Luxembourg.

THIRD-PARTY WEBSITES AND APPS

Our app may contain links to other third-party websites or you may access the App from a third- party site. We are not responsible for the privacy practices or the content of these third-party sites.



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SECURITY

We maintain technical, physical, and administrative security measures to protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration. Some of the safeguards we use include firewalls, data encryption, physical access controls to our data centers and information access authorization controls. We need your help too: it is your responsibility to make sure that your personal information is accurate and that your password(s) and account registration information are secure and not shared with third-parties.

CHILDREN'S PRIVACY

Our Services are not intended for children under the age of 18. Therefore we do not knowingly collect personal information via our websites, applications, services, or tools from anyone under 18.

INTERNATIONAL TRANSFER

We operate internationally and provide our Services to users worldwide allowing them to communicate with each other and make purchases across the globe. That means that your personal information may need to be processed in countries where data protection and privacy regulations may not offer the same level of protection as in your home country. We store and process your personal information on our computers in the United States, Asia, Europe (including **Russia**), Australia and Brazil, and use service providers that may be located in various locations outside of the European Economic Area (EEA). We have put in place appropriate safeguards in accordance with applicable legal requirements to ensure that your data is adequately protected.

UPDATES TO THIS POLICY

From time to time, as our services evolve, we may update this Policy. You agree that we may notify you about material changes in the way we treat personal information by placing a notice on the App. Please check the App frequently for updates.