



GRPVYN INC. - PRIVACY POLICY

Last Update: September 16, 2022

At grpvyn your privacy is of great importance to us. This Privacy Policy (the “**Privacy Policy**”) explains how grpvyn Inc. (“**grpvyn**”, “**we**”, “**our**” or “**us**”) collects, uses, shares, and protects the information of persons who interact with our website, www.grpvyn.com and mobile website (collectively, the “**Site**”), the software-as-a-service offered thereon, and platform (“**Platform**”) (collectively called “**Services**”) and/or make purchases from businesses that are members on our Platform (“**Businesses**” or “**Rewards Providers**”).

Even if you do not sign up as a member of grpvyn, we may still collect, process, use, store, and share certain of your data in accordance with this Privacy Policy.

This policy applies to information we collect:

- On this Site;
- In email, text, and other electronic messages between you and this Site;
- Through mobile and desktop applications you download from this Site, which provide dedicated non-browser-based interaction between you and this Site;
- [When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy];
- [ANY OTHER SOURCES]

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by grpvyn or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Site.

By using the Services, you agree to the policies and practices described in this Privacy Policy and the Terms of Service. If you do not agree with anything contained in this Privacy Policy or the Terms of Service, do not use the Services.

Grpvyn may offer certain products and/or services for a fee or for evaluation purposes. In such situations, additional terms or requirements may apply to our collection and use of information, and if there is any conflict between such additional terms and this Privacy Policy, the additional terms will control.



Key aspects of our privacy practices described in this Privacy Policy include the following explanations:

- The data that we collect and why we collect it;
- How we use that data;
- How we share data; and
- Your rights to your data.

PERSONAL DATA WE COLLECT

When you interact with us through the Services, we may collect data from and about you. You may interact with us, such as when you sign up for a grpbyn account through the Site or otherwise interact with one of our Rewards Providers, or our Platform.

DATA YOU PROVIDE

We collect data from you when you voluntarily provide it, such as when you register for access to the Services and create an account, use certain Services, contact us with inquiries or respond to one of our surveys. For example, we may collect your name, phone number, email address, photograph(s), birthdate, location information, Third-Party Service (defined below) login credentials, shopping and purchasing information, and other data (such as your name and online activity) based on your registration and privacy settings on those Third-Party Services, and the messages you send or receive through the Services.

We may also collect data related to your transaction at one of our Rewards Providers, including your receipt (which may include your subtotal, total, and tip amount), payment card slip (which may include a portion or all of the digits of your payment card and payment card expiration date), bill, and order ticket data (which may include the items purchased and their purchase price) from point of sale (“**POS**”) printers and other POS devices used by Rewards Providers. The collection of this data allows Rewards Providers to automatically award you rewards points.

By voluntarily providing us with data or making a purchase at a Rewards Provider that uses POS devices, you are consenting to our use of it in accordance with this Privacy Policy. If you provide data, you acknowledge and agree that such data may be transferred from your current location to the offices and servers of grpbyn and the authorized third parties referred.

GEO-LOCATION INFORMATION

When you access or use the Services, grpbyn may access, collect, monitor and/or remotely store “location data,” which may include GPS coordinates (including but not limited to latitude and/or longitude), IP addresses, and/or similar information regarding the actual location of your device. Location data may convey to us information about how you browse or use the Services. Location data does not collect or share any personal data about you. Location data may be used in



conjunction with personal data. Some features of the Services, particularly any location-based services, may not function properly if use or availability of location data is impaired or disabled.

DATA AUTOMATICALLY COLLECTED

When you interact with the Services, we also may use various technologies, including cookies, web beacons, pixel tags, log files, local shared objects (Flash cookies), HTML5 cookies, or other tracking technologies, to automatically collect certain general user data and information, including aggregate measures of the Services' use and aggregate technical and other data about your use of the Services that does not personally identify you.

We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).

Grpvyn may use this data to analyze, improve, support and operate the Services, estimate our audience size and usage patterns, store information about your preferences, allowing us to customize our Site according to your individual interests, speed up your searches, for distribution in general benchmarking data and industry and/or other usage and demographic reports, and other business purposes. For example, we may track the total number of visitors or users of the Services, the number of visitors to each page of our Site, the domain names of our visitors' Internet service providers, and how end user customers use and interact with the Services.

We may also remove your personal data from POS device data and aggregate it with other anonymous data, pool and/or combine aggregated data with other information, and share aggregated data with Rewards Providers, its affiliates, service providers, agents and business partners. Grpvyn may also disclose aggregated data to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

[Grpvyn reserves the right to collect, analyze, store, sell and share any and all data related to user activity directly or indirectly involved in the grpvyn platform indefinitely and in perpetuity.](#)

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.
- **Flash Cookies.** Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages of our Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit



the Company, for example, to count users who have visited those pages or opened an email and for other related Site statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

Grpvyn is not responsible for any legal or financial responsibility for securing and maintaining, encrypting or storing financial information and is not responsible for any activities that transpire with a user's data be it financial or otherwise by third parties who have been sold, shared, or stolen data from grpvyn

TRACKING OPTIONS AND CALIFORNIA DO NOT TRACK DISCLOSURES

Our cookies and other tracking technologies help provide additional functionality to the Services and help us analyze Services usage more accurately. For instance, our Services may set a cookie on your browser that saves your login credentials. You can set your browser or operating system settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain Service features. Please refer to your web browser's or operating system's website or "Help" section for more information on how to delete and/or disable your browser or operating system from receiving cookies or controlling your tracking preferences.

COMBINATION OF DATA & COLLECTED FROM THIRD-PARTY SERVICES

We may combine the data we receive from or about you, including data you provide to us and data we automatically collect through the Services, as well as data across other computers or devices that you use, with data we collect or receive about you from other online and offline sources, or from other third party sources.

Federal and state regulations may require that we store questions or submissions for various periods of time. In order to comply with these regulations, we may be unable to delete data from our databases.

In addition, we will integrate various online third-party services, such as social media and social networking services ("**Third-Party Services**"), directly into your grpvyn experience. To take advantage of this feature, we will ask you to provide us your username and password for the relevant Third-Party Services. By enabling such Third-Party Services, you are allowing us to pass your log-in information to these services for this purpose. When you add a Third-Party Service account to the Services, we will collect your login information and other relevant information necessary to enable the Services to access that Third-Party Service and your data contained within that Third-Party Service. However, please remember that the Third-Party Services may use, store and disclose your data differently, as described in their policies, and grpvyn shall have no liability or responsibility for the privacy practices or other actions of any Third-Party Service.



DATA USE

Grpbyn uses the data you provide in a manner that is consistent with this Privacy Policy. If you provide data for a certain reason, we may use that data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the data you provide to answer your question or resolve your problem. Also, if you provide data to obtain access to the grpbyn Services, we will use your data to provide you with access to such services and to monitor your use of such services.

DATA DISCLOSURE

Grpbyn is not in the business of selling your personal data. We consider personal data to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your data with certain third parties without further notice to you, as set forth below:

THIRD PARTY VENDORS

We may share your personal data with third parties to further the purpose for which you provided such information to us. Specifically, we may share your information with the third party vendors listed below. **We urge you to read the privacy practices of all of our Third Party Vendors before submitting any personal data through the Services.**

Third Party Vendor	Privacy Policy
Google	https://policies.google.com/privacy?hl=en&gl=ZZ
Twilio	https://www.twilio.com/legal/privacy
Mailchimp	https://mailchimp.com/legal/privacy/
Slack	https://slack.com/privacy-policy
Asana	https://asana.com/terms
Godaddy	https://www.godaddy.com/agreements/privacy
Stripe	https://stripe.com/us/privacy

BUSINESSES (OR “REWARDS PROVIDERS”)

To the extent you have obtained or redeemed a reward offered by a Business (“Rewards Provider”), made a purchase at or through a Business, or otherwise participated in any other activity sponsored or offered on behalf of the Business, we may provide your data to such Business (i) for the Business to redeem and validate your reward, send you customized offers, troubleshoot redemption, combat fraud and otherwise communicate with you; (ii) as part of legal proceedings affecting grpbyn or the Business; or (iii) to send you marketing information or otherwise facilitate a direct relationship between the Business and you.



BUSINESS TRANSFERS

As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, your data may be part of the transferred assets. We will use reasonable efforts to try to require that the transferee use data provided through the Services in a manner that is consistent with this Privacy Policy.

AGENTS, CONSULTANTS AND RELATED THIRD PARTIES

Grpvyn, may hire agents or service providers to perform activities related to its business. Those activities can be related to sending emails or text messages, maintenance of databases, developing certain features of the Services, and security. In this case, we only provide the agent or service provider with the data that they need to perform their specific function. We also may disclose automatically collected data (card scans, promotional activities, and redemption information) to our Rewards Providers, third-party ad servers, and third-party advertisers. These third parties may match this data with data that they have previously collected about you under their own privacy policies.

YOUR PUBLIC PROFILE

If you make any data available through your public profile, it will be made available to members of the grpbyn community. Please note that your full name and photo could be, by default, available on your public profile, while your phone number, email, and birthday are kept nonpublic (consistent with this Privacy Policy).

LEGAL REQUIREMENTS

Grpvyn may disclose your data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation or assist government enforcement agencies, (ii) protect and defend the rights or property of grpbyn, Rewards Providers, or our users, (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public, (iv) protect against legal liability; (v) protect Rewards Providers from fraudulent, abusive, or unlawful uses; or (vi) protect the security or integrity of the Services.

AFFILIATES

Grpvyn may share your personal data with an affiliate of grpbyn who is in the same corporate family as us as long as their privacy practices are substantially similar to ours.

ANALYTICS AND CONVERSION TRACKING

We use analytics services that use cookies, javascript and similar technologies to help us analyze how users use the Services. The information generated by these services about your use of the Services (including your IP address or a truncated version of your IP address) is transmitted to and stored by analytics service providers on their servers. Those service providers will use this information for the purpose of evaluating your, and other users', use of the Services, compiling reports for us on website activity and providing other services relating to website activity and Internet usage.



We may collect information about your computer, including your IP address, operating system and browser type, for system administration and in order to create reports. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

We use cookies on our site for Google Analytics (the "Analytics Service"). The Analytics Service is a web and mobile analytics tool that helps website and mobile application owners understand how visitors engage with their website and/or mobile application. Analytics Service customers can view a variety of reports about how visitors interact with their website and mobile application so that they can improve them.

Like many services, the Analytics Service uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors use our site. We then use the information to compile reports and to help us improve our site.

Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

The Analytics Service collects information anonymously. They report website trends without identifying individual visitors. You can opt out of the Analytics Service without affecting how you visit our site. For more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>.

We also use Google conversion tracking and/or similar services to help us understand your and other users' use of the Services.

Please see <https://support.google.com/adwords/answer/1722022?hl=en> for more information about conversion tracking provided by Google.

YOUR DISCLOSURES IN BLOGS AND OTHER SOCIAL MEDIA

You should be aware that personal data which you voluntarily include and transmit online on the Services or in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum such as an in-person panel or survey, may be viewed and used by others without any restrictions. We are unable to control such uses of your personal data, and by using the Services or any other online services you assume the risk that the personal data provided by you may be viewed and used by third parties for any number of purposes.

If you connect to a third party service such as Facebook or Twitter through an icon or link on the Services or otherwise link your grpbyn account with a third party service, we may share the contents of your post and associated information (such as your user name, the fact that your connection originated from the Services, and other relevant usage and diagnostic information) with such third party. With your one-time consent, we may also send information about the



content you watch and your activities on the Service to such third parties. Once such information is shared, the use of your information will be subject to that service's privacy policy and this Privacy Policy will not apply.

By providing your contact information through channels including but not limited to your email address and phone number (collectively the “Channels”) to us, you expressly consent to receive communications from us. We may use the Channels to communicate with you, to send information that you have requested or to send information about other products or services developed or provided by us or our business partners, provided that, we will not give your contact information to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

By providing your phone number to us, you expressly consent to receive phone calls and/or text messages from us. We will not give your phone number to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

Any phone calls and/or text messages delivered to your phone or device may cause you to incur extra data, text messaging, or other charges from your wireless carrier. MESSAGE AND DATA RATES MAY APPLY. You are solely responsible for any carrier charges incurred as a result of phone and/or text communications from grpbyn.

By using the Services, you expressly consent to receive in-product communications from us (including, without limitation, push notifications on the App).

Any communication or material you transmit to us by email or otherwise, including any data, questions, comments, suggestions, or the like is, and will be treated as non-confidential and nonproprietary. Except to the extent expressly covered by this Privacy Policy, anything you transmit or post may be used by us for any purpose, including but not limited to, reproduction, disclosure, transmission, publication, broadcast and posting. Furthermore, you expressly agree that we are free to use any ideas, concepts, know-how, or techniques contained in any communication you send to us, as well as any data developed using the content of such communication, without compensation and for any purpose whatsoever, including but not limited to, developing, manufacturing and marketing products and services using such information.

YOUR CHOICES AND OPT-OUTS

We do not share your personal data with other third-party organizations for their marketing or promotional uses without your consent except as part of a specific program or feature for which we will provide the ability to opt out. The Services will automatically send you SMS messages with updates and other information. You may stop receiving SMS messages by replying STOP or OFF in response to any received SMS message. You may also opt-out of receiving SMS messages on the grpbyn website. If you opt-out of receiving



SMS messages, you may not be able to use certain Services. If you do not want to receive marketing emails from us, click the unsubscribe link in the footer of such emails.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may request information about our disclosure of personal data to third parties or affiliated companies for their direct marketing purposes. Further, California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. To make a request regarding disclosure of personal data or for more information for residents under 16 years of age, please contact us at hello@grpbyn.com and put the statement "Your California Privacy Rights" in the subject field. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

EXCLUSIONS

This Privacy Policy does not apply to any data other than data collected through the Services. This Privacy Policy shall not apply to any unsolicited data you provide to grpbyn through the Services or any other means. This includes, but is not limited to, data posted to any public areas of the Services, such as public forums, any ideas for new products or modifications to existing products, and other unsolicited submissions. All such unsolicited data shall be deemed non-confidential, and grpbyn shall be free to reproduce, use, disclose, distribute and exploit it without limitation or attribution.

- **Children:** Grpbyn does not direct the Services to, nor does it not knowingly collect personal data from children under the age of 13. If we learn that a child under the age of 13 has provided personal data to grpbyn through the Services, we will endeavor to delete that data from our databases.
- **Links to Other Website:** This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by grpbyn (the "**Third-Party Sites**"). The policies and procedures we described here do not apply to the Third-Party Sites. The links do not imply that grpbyn endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

SECURITY

Grpbyn takes reasonable steps to protect the data provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted [using SSL technology].



The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site like reviews or message boards. The information you share in public areas may be viewed by any user of the Site.

Still, no Internet, email, mobile or other electronic transmission is ever fully secure or error free, so you should take special care in deciding what data you provide.

We shall investigate and report data breaches after becoming aware of such breach. When a breach of Personal Data is likely to result in a high risk to the rights and freedoms of individuals then we will notify the affected individuals without undue delay after becoming aware of it.

CHANGES TO THIS PRIVACY POLICY

The Services and our business may change from time to time. As a result, it may be necessary for grpvyn to make changes to this Privacy Policy. Grpvyn reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account and/or through a notice on the Site home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this privacy policy to check for any changes, especially before you provide any data to us. Your continued use of the Services after any changes or revisions to this Privacy Policy shall indicate your agreement to the terms of such revised Privacy Policy.

ACCESS TO DATA; CONTACTING US

You may request, by contacting us as specified below, that we update or correct certain data that you have provided to us through the Services. We will take reasonable steps to honor your request. You may also update or correct certain data associated with your account, and you are responsible for maintaining the accuracy of this data.

Please also feel free to contact us if you have any questions about this Privacy Policy or the practices described therein. You may contact us.

GOVERNING LAW

This Privacy Policy and our legal obligations hereunder are subject to the laws of Delaware, United States, regardless of your location. You hereby consent to the exclusive jurisdiction of and venue in the courts located in Delaware, United States, in all disputes arising out of or relating to the Services.



CONTACT

For questions or concerns relating to privacy, we can be contacted at hello@grpvyn.com or via mail at Grpvyn Inc., PO 160237, 1205 Atlantic Avenue, Brooklyn, New York, 11216.