2du App - Privacy Policy

Refer to the Terms of Use: *2du Inc. owns the domains, trademarks, patents & mobile platform called "**2du**". Before you register for a 2du membership account, you must read and agree to the Terms of Use Agreement, including any future amendments (collectively, the "Agreement"):*

*Although we may attempt to notify you via email or SMS text messaging when major changes are made, **you should visit the Terms of Use page periodically** to review the terms. 2du may, in its sole discretion, modify or revise the terms and conditions and policies at any time, and you agree to be bound by such modifications or revisions. If you do not accept and abide by this Agreement, you may not use the 2du service. Nothing in this Agreement shall be deemed to confer any third party rights or benefits.*

———————————————————————————-

Privacy Overview: The 2du platform's API servers and web sites are referred to as "2du" in this document. They are designed to offer news, travel, entertainment, marketing and communications services that allow businesses and consumers to interact with each other using state-of-the-art technologies. These services are free for consumers and business services use a freemium model (basic listings are free, and then there are paid service options.)

We also believe that there is great value in businesses knowing information about consumers as long as this information is **not personally identifiable**. This anonymous information lets these providers adjust their incentives and information to be more relevant to your age, location, gender, lifestyle and interests. We believe that when this is done responsibly, then the exchange of goods and services becomes a WIN-WIN for everyone involved.

To protect your privacy, we believe it is important to be upfront and consistent in all of the areas where your information is being handle. To do this, we have a simple definition of what information is private and what information will be public:

Private information: The 2du app allows consumers to be **PUBLICLY ANONYMOUS** inside the 2du app. By "publicly anonymous", we mean that the 2du company knows one piece of personal information (a verified email address), but no one else knows any personal information about you.

So when you add a public post or comment to the 2du or member business microblogs, you can use **ANY name**, and **ANY anonymous image** and these can be easily changed at **ANY time**. This means that you can be "Unhappy Dude" on Monday and "Great Stuff" on Tuesday on the same Business's microblog. They do not know that "Unhappy Dude" and "Great Stuff" were written by the same customer. If you need

more personalized assistance from a business, they have the possibility of asking you to "Share more info" request which you can decide to answer or not.

Sharing Private information: There may be times where a business will specifically ask for your private information. This will always be easy to see that they are asking for additional information and you are welcome to share this or NOT share as you desire. If you share further private information with 2du or member businesses, then this information might be on our servers and we would then be legally obligated by the US government, or a legal court order to expose your information if we are served a direct legal order to do so.

Email Address Request: The ONLY private information that we require is a current and correct email address. This helps to keep the 2du Platform free from scammers and bad people. During signup we send a verification email to your email account. When you click on the link inside, this verifies that you are a real person and you aren't in the process of creating fake accounts. If for any reason you do not see this verification email in your inbox, select "Account" on the side Navigation and click on the "**RESEND VERIFY**" button next to your email. This will send the verification link to your email address again.

Favoriting a Business: When you "Favorite" a business (on the BizDetails page), this means the following:

- Your private information (email) is still private
- Businesses can contact their followers inside the 2du app (adhering to "do not bother" rules)
- Businesses can ask their followers if you want to share their email address or other private info (name, address, etc). This is typically done in exchange for VIP privileges or discounts.

2du Sells Anonymous Information: We believe that our platform offers a WIN-WIN for consumers & businesses. Consumers want to protect their privacy, and businesses (many times in the same community) want to promote their products or services only to relevant consumers. We are selling 2du memberships that give Businesses the ability to identify relevant consumers while protecting the privacy of the same consumers (2du app users).

This is what a member Business will see about an individual 2du user:

- **Consumer ID:** 377854
- **Gender**:** Male
- **Age**:** 20
- **Location:** Dallas (62%), Frisco (31%), Houston (3%), Corpus Cristi (1%), Aspen (1%), London (1%), Detroit (1%),
- **Recent Interest:** Japan, Singapore, Scuba Diving, Philippines, Football, Dallas Cowboys, Safari
- **Follows:** Pro Sports, Restaurants, Amateur Sports, Luxury Hotels

** NOTE: Gender and age can be <u>inaccurate</u> since it is entered (and easily changed) by the user at any time.

User Location Information: To enhance your experience, we wanted to be able to tell our 2du member businesses that "**user #377854**" is a great potential customer, so you better be nice to them ! To do this, we have a secure feature called a "**GeoScore**" which shows up in your app as a number that indicates "How many days a user has been in the same city as a particular business". That means that you have a **unique GeoScore for EVERY business**. It is the responsibility of each business regarding what type of discount or special they will offer these "hot prospects". To create a WIN-WIN situation, this number is NOT tracking exact locations (just cities), is NOT real time, only counts 1 per day per city, and does NOT expose the dates when a GeoScore point was generated.

> **GeoScore Use Case:** A casino in Las Vegas might say that they would like to offer a special room rate to all 2du users who have 5 or more GeoScore points in Las Vegas. This lets them promote their business to people who have been in Las Vegas 5 or more days. This means that they like to visit Las Vegas ! To protect these user's privacy, the business does not know anything about where those users currently live, where they previously stayed in Las Vegas or when they last visited. But they are certainly "hot prospects".

Conformance: We follow the Children's Online Privacy Protection Act1, the FCC's CAN-SPAM Act2 regulations and the Mobile Marketing Association Consumer Best Practices Guidelines3. Individual mobile carriers also have consumer notification regulations which we adhere to.

> 1 = Children's Online Privacy Protection Act (http://www.ftc.gov/ogc/coppa1.htm)
>
> 2 = FCC's CAN-SPAM Act (http://www.fcc.gov/cgb/consumerfacts/canspam.html)
>
> 3 = Mobile Marketing Association Consumer Best Practices Guidelines
>
> (http://www.mmaglobal.com/bestpractices.pdf)

Cookies: A cookie is a small data file that is sent to your computer when you first visit an app or website. As with most website cookies, our cookies include an identification number that is unique to the app or website you are using. This identifier helps the app or website remember basic information such as the user sign-in, user settings, or the page that one was on when the app or website was last used. We DO NOT collect any non-2du information using these files.

Logging information: When you use your 2du app, we collect information that gets recorded for each anonymous user (example ID= #377854)

This customer (#377854) has the following login information recorded (2du access only)

- login date/time
- IP address
- phone type

During a user session, we record the following information which enables our advertising targeting used by member businesses:

- Favorite Businesses (primarily categories)
- Media Locations Viewed (percentages)
- Media Business Types Viewed (percentages)
- Cities visited (one point per city per day)
- Session Length

Data Storage. The 2du app communicates with several API servers. These servers are hosted by well known 3rd party professional hosting providers. Because we keep back-up copies of data for the purposes of recovery from errors or system failure, residual copies of some data may remain on our systems for some time, even after you have deleted information or after the termination of your account. 2du employees do not access this information unless you specifically request them to do so (for example, if you are having technical difficulties accessing your account) or if required by law, to maintain our system, or to protect 2du or the public.

Required contact from 2du. 2du may send you information related to your 2du account or 2du services. We will limit these contact to only important account information such as a password change has occurred, or an important policy change. This contact will be extremely rare.

Editing or Deleting your Account. You can edit or terminate your 2du account at any time. If you terminate your account, we typically deactivate accounts within one week of such requests. You should be aware, however, that due to the storage of backup copies, some residual information may remain stored on our systems even after the deletion of information or the termination of your account.

Please contact us if you have any questions, comments or concerns about this policy.

2du Inc.   support@2du.com

Burlingame, CA 94010   http://2du.com