#open Privacy Policy v1.1

Your data is Yours

Our community is designed for your safety. Protecting your data is a key part of that.



01. Our data ethics

How do we determine right from wrong?

Ethics help us define what we believe is right and wrong. Our data ethics shape our actions when handling your data.



Principle 1: Humanity

Data is part of our humanity. We must treat it that way. We respect data the same way we respect people. Wherever possible, we will share information with you before we ask you to share it with us.



Principle 2: Stewardship

Your data is *yours*. We work hard to be the temporary data guardian you deserve. Privacy requires control over the information that you do and don't share and knowing that your information only flows in ways that you expect and benefit from.

If we make material changes to our Privacy Policy, we will notify you and give you the opportunity to familiarize yourself with the changes we have made and decide if you would like to continue using #open.

01.1 How we use, and do not use, your data

What we will and will not do with your data

The most important step we have taken to safeguard your privacy is ensuring that our incentives are the same as yours. We do not make money selling your data. We do not make money using your data to send you targeted advertising. Because we do not do these things, we have no need or desire to collect excessive or intrusive information.

We want to clearly and directly communicate what we will and will not do with your data.

We will



Utilize your data to provide services to you within our community.



Track your usage of our services to improve those services.



Analyze traffic and visitor data from our website and other sources to evaluate our advertising and outreach efforts.



Anonymize your data, then use it to research gender, orientation, relationships and relationship styles, and human sexuality.

We will not



Sell your data to advertisers or any other third party.



Use your data to serve you targeted advertising.



Trade or give your data to any third party without explicit disclosure except where required by law.



Acquire private data about you from third parties without your express permission.

02. When and how we collect data

How do we get access to your data?

Every time you interact with our app or website, our computers (the machines that actually provide the app and website) record data about what you do. Also, of course, when you post something to the service, we store that too.

You give	We collect	
	0	Analytics data
0		Your account information
		Your profile information

- Cocation data
- App usage information

02.1 Cookies

Cookies help us track interactions with our website

Cookies are small files that websites and the companies they work with place on the computers of people who visit the site. They allow the website to track which computers are visiting the site, who are first-time versus repeat visitors, etc.

Cookies are also used by third parties such as Google—who provides our website analytic data—to target ads to you on other sites around the Internet.

You do not have to accept the placement of cookies on your computer when you visit our website. If you don't want to be tracked using cookies on our website, you can always opt out.

You can also opt out of Google Analytics for the entire internet by installing the Google Analytics Opt-Out browser plugin, which you can <u>download here</u>.

Our app (that runs on your mobile phone) does not use cookies. But you should know that your mobile phone operating system and/or your mobile data provider may use other technologies to track where you are and what you do online.

We try to limit our usage of cookies. If you're willing to help us out by allowing us to collect usage data using cookies, here's what you need to know about the cookies we use.

Cookie	Service	Duration	Purpose
_ga	Google Analytics	2 yrs	Used by GA to distinguish between users

_gid	Google Analytics	24 hrs	Used by GA to distinguish between users
_gat	Google Analytics	1 min	Used to limit the rate of requests to GA services
ga-disable	#open	100 yrs	Records your choice to opt out of our use of cookies
ga-enable	#open	100 yrs	Records your choice to opt in to our use of cookies

Legal basis: Contract Legitimate interest

02.2 Data from minors

Minors are not allowed on #open

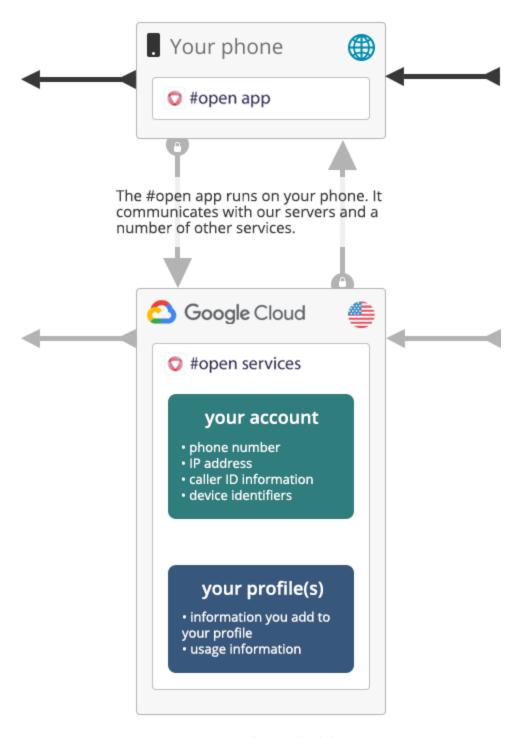
We do not allow users under the age of 18 to use #open or knowingly collect any information regarding anyone under the age of 18. If you believe that a #open user is under the age of 18, please contact us!

03. Where your data goes

We rely on a number of services

#open makes use of a number of services to help us run the #open community and app. You can see the components at work in #open and what data they send and receive below.

We have signed Data Processing Agreements with the services we use to make sure that they take the privacy and security of your data as seriously as we do.

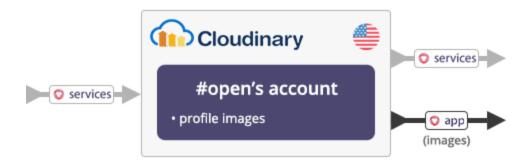


#open services is where all of the magic happens. This is where profile and account information is stored, as well as where the app requests new profiles to show you.

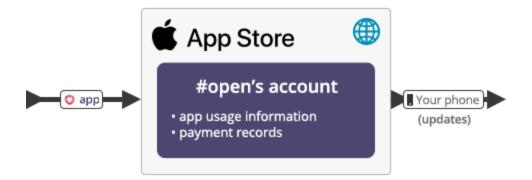


We use Twilio to send you the SMS messages that allow you to login to #open, as well as to send push notifications. We also use Twilio to lookup caller ID information that helps us prevent fraud.

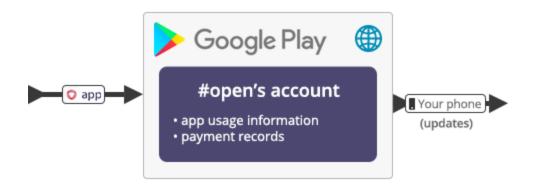
Push notifications are how messages are sent to the app to let it know that you have new messages or a new match.



We use Cloudinary to host and serve profile images.



We use the Apple App Store to get #open to users on iOS devices and to keep it updated.



We use Google Play to get #open to users on Android devices and to keep it updated.

04. Your rights and actions

Making it easier to manage your data

You have a number of rights relating to your data and how it is used.

We're committed to ensuring that, regardless of where you're located, you are provided with the 8 fundamental rights given to users (called "data subjects") identified in the European General Data Protection Regulation (GDPR), as well as any other rights your local jurisdiction guarantees.



Right to information

You have the right to know what personal data about you we are collecting and processing, and the purposes for which we are processing it.



Right of access

If we are collecting, storing or processing any of your personal information, you have the right to request a copy of that information.



Right to correction

You have the right to request that we correct any inaccuracies in any of the personal data we have about you.



Right to erasure

You have the right to request that we delete any of your personal information that we have access to. You can delete your account at any time by scrolling to the bottom of the Profile tab in the app, and selecting "Delete Account".

As soon as you delete your account, we will either (a) delete or (b) anonymize all data we have collected about you. When we anonymize data, we will remove things like your name, phone number, email addresses, and pictures, but keep other data for research and analysis to help us make the app better and for scientific purposes. But there are two key **exceptions:** (1) where the law requires us to keep the data, and (2) where our legitimate interest in preventing fraud and protecting the safety of our users requires us to keep it

Right to restriction of processing



In some situations you can require that we not process your data even though we still have it: (1) if you are challenging the accuracy of the data, you can have us stop processing it while we check it out; (2) if we aren't allowed to process the data, but you don't want us to delete it; (3) if we don't need it any more for current operations, but we need to keep it for legal reasons; or (4) if you are challenging our right to process it in the first place.



Right to data portability

You have the right to request that we provide a copy of any of your personal information that we have access to in a format that allows you to use that data elsewhere.

Right to object You have the righ



You have the right to request that we stop processing any of your personal information if in your particular situation you believe that processing your information is contrary to the public interest or if you believe that processing your information violates your own fundamental rights and freedoms.



Right to withdraw consent

You have the right to withdraw your consent for us to continue processing your personal information at any time.

05. How to contact us

Other questions?

We're working hard to be as transparent as we can possibly be, but you may still have questions: we'd love to chat!

You can always reach us by emailing us at privacy@hashtagopen.com or, if you're already a member of the #open community, by sending a message to @hashtagopen in the app.