

# Privacy and Security

Effective January 2017 At Which-Card (together with the RoeApps, evenro apps, "which card," "we," "us" or "our"), trust has always been the foundation of our relationship with customers. We understand your desire for privacy, and we recognize that you trust us with your personal and financial information. Our Privacy Policy is designed to describe our privacy practices and principles in a format that is easy to navigate, read and understand. We pledge to treat your personal information with the utmost care and respect.

## Privacy Policy

This Privacy Policy (the "Policy") describes the treatment of information that is provided or collected through any of our online interfaces to which a copy of the Policy is posted, including Which-Card (the "App"), Applications we will or have placed on third party sites such as Facebook®, Twitter® and other social media services, and other services provided by us (the "Services"). It also explains how we collect, use and share information based on users' interactions with our system, both on the Services and on online interfaces owned by third parties.

We pledge to use and share any information that we collect from or about our customers in accordance with the law. Feel free to contact us with any questions regarding our privacy policy or license agreement. While this Online Privacy Policy describes how we treat information, please be aware that additional terms and conditions may apply for certain parts of our Applications and Services.

### 1. Types of Information We Collect

We collect one basic type of information – anonymous information. We do not collect any Personal Information. We currently do NOT collect location information although we keep the right to do so for the purpose of improving our services quality.

"Personal information" refers to information that identifies (whether directly or indirectly) a particular individual, such as information you provide on forms, surveys, applications or similar online fields. Examples may include your name, postal address, email address, telephone number, Social Security number, date of birth or account information.

"Anonymous information" means information that does not directly or indirectly identify, and cannot reasonably be used to identify, a particular individual. Examples may include information about your Internet browser, your device identifier, demographic information that you provide to us (e.g., your household income) and aggregated or de-identified data.

"Location information" means information that may be collected by certain mobile applications that identifies your physical location.

### 2. How We Collect Your Information

We may receive information about you from other online and offline sources, such as Google, Apple, social media platforms and other third parties.

In addition, we may collect information about your activity on the Services based on your interaction with us and use pattern within our Apps and Services.

### 3. How We Use Information That We Collect

We may use information that we collect in order to, among other things:

- Communicate with you about your service inquiries.  
Since data is anonymous in our storage, you will have to provide us information so we could link the anonymous data to your service request.  
Either way, we will not link within any of our systems the data collected about you to any of the anonymous data collected.
- Allow you to participate in surveys, sweepstakes, contests and similar promotions, and to administer such promotions (note that these promotions may contain additional disclosures regarding our collection and/or use of your information)
- Consistent with local law, required disclosures, and choices and controls that may be available to you:
  - Send you offers and promotions for our products and services, or products and services that may be of interest to you;

- Personalize content and experiences on the Services;
- Provide you with advertising based on your activity on the Services and on third-party websites and applications. For additional information regarding our indirect use of this information through our Services please refer to Google's privacy policy and license agreement since we use Google as the advertise.
- Optimize or improve our products and services
- Detect, investigate and prevent activities that may violate our policies or be illegal
- Comply with our legal and regulatory obligations
- Enforce our terms and conditions and otherwise protect our rights and operations

#### **4. How We Share Information That We Collect**

We currently do not directly share any data we collect. Yet, we keep the right to share data collected with partners.

This section will be updated in the future based on specific agreements with partners.

Either way, no personal nor identifying data will be shared (and such information is not collected nor kept in our systems).

#### **5. Online Tracking and Advertising**

We and certain trusted service providers operating on our behalf collect information about your activity on the Services using tracking technologies, including:

- Location tracking on mobile devices. Certain applications on mobile devices may transmit information to us about your location when you request information from them. An example includes your physical location when you search for a nearby businesses using your mobile device. We may use that information to improve the products and services we provide to you as well as improving our services generally in your area.

Information collected through tracking technologies is used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you return to the Services
- Deliver relevant content based on your preferences, usage patterns and location
- Monitor and evaluate the use and operation of the Services
- Analyze traffic on the Services and on websites or mobile applications of third parties

Other technologies. We may use other technologies to understand how you navigate and use the Services. This information helps us to better understand how the Services are used and to improve them.

We use Google Analytics, which uses cookies and other similar technologies, to collect information about use of the Services anonymously and report website trends, without identifying individual visitors. To learn more, including how to opt out, visit <https://tools.google.com/dlpage/gaoptout>.

You may control the advertisement collection process by setting device configurations. Please refer to your device manual for more information regarding your ability to control such settings and how to configure it.

#### **6. Other Information Collected Automatically**

Browser or Device Information: Certain information is collected through your device, such as your device type (Windows, Android, or Macintosh), screen resolution, operating system name and version, device manufacturer model and identifier, language, Internet browser type and version if browsing to any of our websites, and the name and version of the Services (such as the Application) you are using. We use this information to ensure that the Services function properly. We do not collect all this information in all cases.

Application Information: When you download and use an Application, we and our service providers may track and collect usage data, such as the date and time the Application on your device accesses our servers and what information and files have been downloaded to the Application based on your device number.

IP Address: Your IP address is a number that is automatically assigned to your computer by your Internet Service Provider. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We DO NOT use IP addresses nor directly collect it, yet, services we use, such as Google Place or Google Ads, may collect it in accordance to their privacy policy.

#### **7. Linked Websites**

The Services may contain links to third-party websites not controlled by us. We encourage you to be aware when you leave the Services and to read the privacy policies and terms of use of any such websites or service that may collect your personal

information, as they will likely differ from those of the Services. We do not guarantee and we are not responsible for the privacy or security of these websites or services, including the accuracy, completeness or reliability of their information. In addition, we are not responsible for the information collection, use and disclosure practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer or provider, social media platform provider, operating system provider, wireless service provider or device manufacturer.

#### **8. Data Security and Online Risk-Free Guarantee**

Your privacy is very important to us and we are committed to protecting your personal information from unauthorized access or use. We seek to use reasonable technical and administrative measures to protect information within our services. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below. Please file a report with the police if appropriate.

We use Amazon services to store our data and your usage logs.

Amazon Web Services (AWS) Privacy Policy and User License Agreement applies to your data.

All collected data is stored on AWS and Google servers, within their data centers, therefore we cannot control the physical security nor many aspects of the data availability to others.

To protect you the best we only collect anonymous data we consider essential.

#### **9. Children’s Privacy**

We do not use the Services to knowingly solicit personal information from or market to children under the age of thirteen (13) without parental consent. We request that such individuals do not provide personal information through the Services. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly Contact Us and we will delete such information from our system and request our third party providers to do so as well.

#### **10. Social Media Platforms**

We may interact with users of various social media platforms, including Facebook® and Twitter®. Please note that any content you post to such social media platforms (e.g., pictures, information or opinions), as well as any personal information that you otherwise make available to users (e.g., your profile), is subject to the applicable social media platform’s terms of use and privacy policies. We recommend that you review this information carefully in order to better understand your rights and obligations with regard to such content.

#### **11. Retention Period**

We will retain your information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required, or permitted, by law.

#### **12. Changes to the Online Privacy Policy**

From time to time, we may make changes to this Policy in order to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We encourage you to review the Policy periodically to ensure that you understand how we collect, use and share information through the Services.

Any changes to the Policy will become effective when the revised Policy is posted on the Website. By continuing to use the Services following such changes, you are agreeing to accept the terms of the revised Policy.

We will inform you with a note within our services when major changes to this agreement occur (a major change is a new section or a significant change in one of our terms).

Contracting with partners, reflecting updates to accommodate partners policies, and modifying sections we are “keeping the right to” are not considered significant changes.

#### **13. Contact Us**

If you have any questions or comments about this Policy or our privacy practices generally, we encourage you to contact our customer service department by using the “Contact Us” link within our app, or by using the “Contact Us” tab within our web-site.

We do not explicitly write our email address for preventing spammers from interrupting our services.

You agree not to write our email addresses, phone numbers, or any such information in any public source (such as online forums, Facebook, yellow pages, etc.).

