

Privacy Policy

Last Updated: February 21, 2020

This Privacy Policy (the “**Policy**”) applies to the Personal Information that Momo Networks, Inc. (“**Momo**”, “**we**,” or “**us**”) gathers from you through our websites at aguitarforum.com and <https://momoboard.com/> or through our mobile app, and in the course of providing our services (collectively, the “**Services**”). This Policy describes how we use and disclose such information, your rights and choices with respect to your Personal Information, and how you can contact us if you have any questions or concerns.

1. Personal Information We Collect

We may collect Personal Information about you directly from you and from third parties, as well as automatically through your use of the Services. In this Policy, “**Personal Information**” means any information relating to an identified or identifiable individual.

Personal Information Provided by You

- **Registration and profile information.** If you create an account for our Services, we collect Personal Information related to the creation of the account and usage of our Services via your account. When you sign up, we ask you for your name, email address and password. You must register for an account to create and join community boards and to communicate via the Services.
- **Content provided by you.** When you add content to our Services for example by creating a board in our Services or by adding comments, links or other content to the existing boards and by sending messages via private chat rooms or group chat rooms in our Services, we process any Personal Information included in such content or comments.
- **Communication information.** When you contact us via email or other means, you may provide us with your Personal Information such as your name, email address, company, and the content, date, and time of your message. We also process all information in private messages you send or receive using our Services, including the contents of such messages.
- **Support information.** When you request technical support services, we will process your contact information, such as name and email address as well as information on the reasons for your support request, and any additional information you may provide in that context.
- **Careers.** If you decide that you wish to apply for a job with us, you may submit your contact information and your resume online. We will collect the information you choose to provide on your resume, such as your education and employment experience.

Any information that you choose to share on any publicly available portion of the Services or with third parties may be collected and used by third parties without restriction.

Where required by applicable law, we indicate whether and why you must provide us with your Personal Information and the consequences if you refuse.

Information Collected via Automated Means

- **Usage information.** When you use our Services, we may automatically collect information about your visit via cookies, beacons, invisible tags, and similar technologies (collectively “cookies”) in your browser and on emails sent to you. This information may include Personal Information, such as your IP address, web browser, device type, and the web pages that you visit just before or just after you use the Services, as well as information about your interactions with the Services, such as the date

and time of your visit, and where you have clicked. You can find more information about how we use cookies in the section *How We Use Personal Information* below.

- **Information collected via social media tools.** We may collect Personal information via automated means such as social media tools, widgets, or plug-ins to connect you to your social media accounts. These features may allow you to sign in through your social media account, share a link, or post directly to your social media account. When you visit a website that contains such tools or plugins, the social media or other service provider may learn of your visit. Your interactions with these tools are governed by the privacy policies of the corresponding social media platforms.

Information Collected from Other Sources

- **Third parties.** We may obtain information, including Personal Information from third parties and sources other than our Services, such as our business customers and partners. If we combine or associate information from other sources with Personal Information that we collect through our Services, we will treat the combined information as Personal Information in accordance with this Policy.

2. How We Use Personal Information

We use Personal Information we collect for the following purposes:

- **Providing the Services.** We use your Personal Information to operate, maintain, enhance, and provide features of our Services.
- **Customer relationship management.** We may process your Personal Information for customer relationship management purposes.
- **Communicating with you.** We may use your email address and other Personal Information as necessary to contact you for administrative purposes such as to provide information that you request, and to respond to comments and questions. We may also notify you about major updates in our Services.
- **Advertising and marketing.** We may use your email address and other Personal Information to send marketing communications, including updates on promotions and events relating to products and services offered by us and by third parties we work with. Generally, you can opt out of receiving any promotional communications as described below under *Your Rights and Choices*. Where required under applicable law, we will only send you promotional emails with your opt-in consent.
- **Support.** We use your Personal Information to provide technical support, including diagnosing and resolving any issues you report.
- **Understanding usage and improving the Services.** We use your Personal Information that we collect through the Services to understand and analyze the usage trends and preferences of our users, to improve the Services, and to develop new products, services, features, and functionalities.
- **Administrative and legal purposes.** We may use your Personal Information to address any administrative or legal issues pertaining to Momo, including but not limited to audits, security, compliance with applicable laws and regulations, and for quality assurance purposes.
- **Aggregation.** We may aggregate or otherwise de-identify your Personal Information and use the resulting information for other business purposes.

How We Use Cookies and Similar Technologies

We and our third-party service providers may use the following cookies to collect Personal Information:

- **Functional cookies.** Some cookies are strictly necessary to make our Services available to you (e.g., to remember your preferences). We cannot provide you with the Services without these functional cookies.
- **Analytical cookies.** We use cookies for website analytics purposes to operate, maintain, and improve the Services. We may use third party analytics providers such as Mixpanel, Segment and Google Analytics to collect and process certain analytics data on our behalf. These providers may also collect information about your use of other websites, apps, and online resources.

Where required by applicable law, we obtain your consent to use cookies. You can find more information about your rights and choices, and how to opt out of the use of certain cookies in the section *Your Rights and Choices* below.

Our Use of European Personal Information

If you are located in the European Economic Area, we only process your Personal Information when we have a valid “legal basis”, including when:

- You have consented to our particular use of your Personal Information, for example to send you marketing communications.
- We need your Personal Information to provide you with our Services, for example to respond to your inquiries.
- We have a legal obligation to use your Personal Information, for example to comply with tax and accounting obligations, or with a court order.
- We or a third party have a legitimate interest in using your Personal Information. We have a legitimate interest in using your Personal Information for development and internal analytics purposes, and otherwise to improve the safety, security, and performance of our Services. We only rely on our or a third party’s legitimate interests to process your Personal Information when these interests are not overridden by your rights and interests.

3. When We Disclose Personal Information

We may disclose your Personal Information to third parties with your consent or in the following circumstances:

- We work with third-party service providers to provide website development, hosting, maintenance, and other services for us. These third parties may have access to or process your Personal Information while providing those services to us. Generally, we limit the information we provide to these service providers to that which is reasonably necessary for them to perform their functions on our behalf. We also require these service providers to maintain the confidentiality of such information.
- We may disclose your Personal Information to third parties whose features (e.g., third-party cookies, widgets, plug-ins) are integrated into our Services. We may also disclose your Personal Information to social media networks when you directly engage with those platforms.
- Our Services are social media services to which you can post content that is viewable by other users. The content you post to the Services will be displayed on our Services and viewable by other users by default. Although this content is public by default, below in the “Your Rights and Choices” section of this Privacy Policy, we describe the controls that you can use, along with other relevant settings associated with your account, to limit the sharing of certain information. We are not responsible for

the other users' use of available information, so you should carefully consider whether and what to post or how you identify yourself on the Services.

- We may disclose your Personal Information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.
- We reserve the right to disclose your Personal Information if we believe, in good faith, that such disclosure is appropriate or necessary to: (i) protect us against liability; (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activities; (iii) investigate or defend ourselves against any third-party claims or allegations; (iv) protect the security or integrity of our Services and any facilities or equipment used to make our Services available; or (v) protect our property or other legal rights.
- We may disclose or otherwise transfer Personal Information to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.
- We may share Personal Information with our affiliates and subsidiaries where appropriate for any of the above-mentioned purposes.
- We may also disclose your Personal Information to third parties with your permission.

4. Your Rights and Choices

If you decline to share certain Personal Information with us, we may not be able to provide to you some of the features and functionalities of our Services. If you wish to access, amend, or delete any Personal Information we hold about you, you may contact us using the contact details at the end of this Policy. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so under applicable data protection law.

If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained in the email. You may also opt out from receiving commercial email from us and any other promotional communications that we may send to you from time to time, by contacting us via the contact details at the end of this Policy.

If you opt out of receiving commercial email from us or otherwise modify the nature or frequency of such emails, it may take up to ten business days for us to process your request. During that time, you may continue to receive promotional communications from us. If you opt out of receiving commercial messages from us, you will still receive administrative messages from us regarding our Services.

With respect to content you post to our Services, we provide you with settings that allow you to set your sharing preferences for that content. Certain information may always be available to others, and other information is made publicly available to others by default. To change whether certain information is publicly viewable, you can adjust the settings in your account. Additional information regarding privacy settings can be found here <https://www.momoboard.com/faq>

Your Cookie Choices

Many web browsers allow you to manage your preferences relating to cookies. You can set your browser to refuse cookies or delete certain cookies. You may be able to manage other technologies in the same way that you manage cookies using your browser's preferences. Please note that if you choose to block cookies, doing so may impair the use of our Services.

- **Google cookies.** You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout> or via Google's Ads Settings or Ad Settings for mobile apps.

Your European Privacy Rights

If you are located in the European Economic Area, you have additional rights described below.

You may request access to and receive information about the Personal Information we maintain about you, update and correct inaccuracies in your Personal Information, restrict or object to the processing of your Personal Information, have the information anonymized or deleted, as appropriate, or exercise your right to data portability to easily transfer your Personal Information to another company. You may also have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work, or where an incident has taken place.

You may withdraw any consent you previously provided to us regarding the processing of your Personal Information at any time and free of charge. We will apply your preferences going forward, and this will not affect the lawfulness of the processing that occurred before you withdrew your consent.

You may exercise these rights by contacting us via contact details at the end of this Policy. Please note that there are exceptions and limitations to each of these rights, and that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain information for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

5. International Visitors

Our Services are hosted in the United States. If you choose to use our Services from regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your Personal Information outside of those regions to the U.S. for storage and processing, which does not have the same data protection laws as your jurisdiction. When we transfer your Personal Information to the U.S., we take steps to comply with applicable data protection law, in particular legal requirements regarding adequate protection for data transfers. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our Services. By providing any information, including Personal Information, on or to the Services, you consent to such transfer, storage, and processing.

European Visitors

If you are located in the European Economic Area, we will comply with applicable EEA data protection law when transferring your Personal Information outside of the EEA. We may transfer your Personal Information to countries which have been found to provide adequate protection by the EU Commission (e.g., Switzerland and Canada), use contractual protections for the transfer of Personal Information, or

transfer to recipients who have certified to the Privacy Shield or adopted Binding Corporate Rules. For more information about how we transfer Personal Information outside of the EEA, or to obtain a copy of the contractual safeguards we use for such transfers, you may contact us as specified below.

6. Children's Privacy

Our Services are not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13 without verifiable parental consent, where required. If you are under 13 years of age, please do not use or access the Services at any time or in any manner. If we learn that we have collected Personal Information from persons under 13 years of age and without verifiable parental consent, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 13 years of age has obtained an account on the Services, you may alert us using the contact details at the end of this Policy and request that we delete that child's Personal Information.

7. Retention

We take measures to delete your Personal Information or keep it in a form that does not permit you to be identified once it is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When we determine how long to retain your Personal Information, we consider various criteria such as the type of services we provided to you, the nature and length of our relationship with you, the mandatory retention periods provided by law, and the relevant statutes of limitations.

8. Third-Party Services

Our Services may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through our Services. We are not responsible for the content or the privacy and security practices and policies of third-party sites or services to which links or access are provided through the Services. We encourage you to learn about third parties' privacy and security policies before you provide them with your information.

9. Information Security

We use certain physical, organizational, and technical safeguards designed to improve the integrity and security of the Personal Information that we collect and maintain. We cannot, however, ensure or warrant the security of any information you transmit to us and you do so at your own risk.

10. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify this Policy, we will make it available through the Services, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Services for the first time after such material changes are made. Your continued use of the Services after the revised Policy has become effective indicates that you have read, understood, and agreed to the current version of this Policy.

11. Our Contact Information

Unless otherwise indicated, Momo is the entity responsible or “data controller” for the processing of your Personal Information as described in this Policy. Please contact us with any questions or comments about this Policy, your Personal Information, our use and disclosure practices, or your consent choices by email at privacy@momoboard.com or by postal mail at:

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USA