

Privacy policy

Last updated on: May 21, 2021

Introduction

This Privacy, Data Ownership and Proprietary Rights Agreement ("Privacy Policy") sets out the basis on which Rolo Innovation Inc. of 306 Victoria house, Victoria house, Mahe, Seychelles (Company registration number: 209498) (together with our subsidiaries, our holding company, subsidiaries of our holding company, and distributors collectively called "Rolo Innovation", "our," "we," or "us") acts as a "Data Controller" to collect "User Data" (also referred to as "Personal Data") from you, and how we and third parties process such data as a "Data Processor" when you use our apps, services, features, software, or website (together, "Services").

Please read our Privacy Policy in full so that you are aware of what data we collect, how we handle your data when it gets deleted, your rights with regard to requesting a copy of that data from us, or requesting its deletion, as well as the limitations or restrictions of those requests and your rights.

On some devices, we display our Privacy Policy with separate "Highlights" boxes throughout. These Highlights aim to explain our Privacy Policy in a simple and easy-to-read manner. THESE HIGHLIGHTS DO NOT CONTAIN THE FULL DETAILS OF THE PRIVACY POLICY YOU ARE AGREEING TO, AND SHOULD ONLY BE CONSIDERED AS COMMENTARY ON THE PRIVACY POLICY TO WHICH YOU ARE AGREEING.

Our Privacy Policy is organized with certain headings for easy navigation of this document by the reader. However, the entirety of this document and any other referenced documents need to be read for a complete understanding of our Privacy Policy before agreeing to it. The headings should only be used for such navigation.

Contact information

If you have any questions, comments, or requests regarding your privacy and personal data, please email them to Rolo Innovation's Data Protection Officer (DPO), Noe Charmet: privacy@rolo.chat.

Governing language of our Privacy Policy

Our Privacy Policy is written in English. Any translated version is provided solely for your convenience. To the extent any translated version of our Privacy Policy conflicts with the English version, the English version controls and remains the correct and most up-to-date version of this

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Privacy Policy. If our Privacy Policy is not available in the language you choose for our website or apps, we will default to showing you the English version, and it is your responsibility to accurately translate and understand the Privacy Policy before you choose to accept it. Singular and plural terminology and definitions throughout our Privacy Policy are used interchangeably, and should not be construed as a fixed quantity unless clearly defined as such, e.g. "One (1) Item."

Definitions

"Rolo" refers to all of our services ("Services") and products including, but not limited to:

- applications for mobile, tablet, computer, web browser and other smart device systems;
- the Rolo.Chat website, including its subdomains and any other website through which we make our Service available;
- any applications, sample and content files, source code, scripts, instruction sets or software included as part of the Service, as well as any related documentation; and
- the Services provided by your access or usage of any of the above.

The term "User" is used throughout this document to refer to you and your usage of Rolo. If you are paying for your use of Rolo, we may additionally refer to you as a "Customer". Some of our [Terms](#) may only apply to Customers or those users who do not qualify as Customers. Such limitations are always explicitly mentioned within each affected clause. In the absence of any such mention, clauses apply to all Users.

Other definitions:

- **User Account:** The "User Account" is the unique login details and information that a User uses to access the Services. These User Accounts may "belong to" or be "owned by" an Organization as defined below.
- **Organization:** An "Organization" is any number of Users that participate in society as a group, including but not restricted to a registered company, charitable body, industry organization, government department, or any team, family, or group of individuals.
- **Administrator:** An "Administrator" is a User that has been given or claimed the ability to change certain settings for one or more specific Organizations, as well as some of the settings for Users that are assigned to those Organizations, as well as their respective User Accounts.
- **Conversation:** A "Conversation" is any form of communication or data sharing by one or more parties through our Services, no matter the format of the data or communication.
- **Communicated Data or Communication Data:** "Communicated Data" or "Communication Data" is data shared within a Conversation, including (but not limited to) any words, messages, information, images, videos, audio, media, or any other files, documents or data regardless of format.
- **User Data:** "User Data" is any data or information about a User Account, including (but not limited to) the personal details of the User that has been registered to use a User Account and any information regarding their usage of our Services, including but not

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limited to their frequency of access to our Services, the types of devices used to access our Services, the locations from which our Services are accessed and which other User Accounts they are connected to.

- Organization Data: "Organization Data" is any data or information about an Organization, including (but not limited to) the registered company details, contact details, payment information, and any information regarding the usage of our Services by its User Accounts, such as which User Accounts are part of the Organization, and which other Organizations you may be connected to.
- Data Controller: Any persons or legal entities involved in determining the purpose and ways of processing your User Data. For us, that entity is Rolo Innovation Inc. as described in the section titled "Introduction".
- Data Processor: Any persons or legal entities involved in processing your User Data on behalf of the Data Controller.

User Data

For the purposes outlined below, we may collect and process the following personal information ("User Data") about you:

1. Information you give us
2. Information we received from your devices
3. Information we collect about you
4. Information we receive from third-party services

Information you give us

Information that you provide us (which may include your name, address, email address, telephone number, credit card information and other personal descriptions such as job title and employer, photos and videos and any other Personally Identifiable Information you give us) by filling in forms via our Services, or by corresponding with us (by phone, email, third-party communications platforms or otherwise), for example:

5. when you register for a User Account with us via our Services;
6. when you report any problem to us;
7. when you use certain features of our Services;
8. when you request any support from us; or
9. when you complete any survey or questionnaire we send you.

Information we receive from your devices

Depending on your specific device used for accessing and using our Services, Rolo Innovation may request certain permissions that allow it to access the User's "Device Data" as described below.

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By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. To revoke these permissions, Users may refer to the device settings or contact Rolo Innovation's Data Protection Officer (DPO), Noe Charmet: privacy@rolo.chat.

The exact procedure for controlling app permissions may be dependent on the User's device and software. Please note that the revoking of such permissions might impact the proper functioning of Rolo.

If the User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified, or removed) by Rolo:

- Contacts permission: Used for accessing contacts and profiles on the User's device, including the changing of entries, such as for making it easier to connect to your existing contacts on Rolo.
- Photo Library permission: Allows access to the User's Photo Library, enabling the User to share their Photos to the participants of a Conversation for example.
- Files permission: Allows access to the User's stored files, enabling the User to share their files to participants of a Conversations for example.
- Approximate location permission (continuous): Used for accessing the User's approximate device location. Rolo may collect, use, and share User location Data to provide location-based services, such as sharing your live location to the participants in a Conversation.
- Approximate location permission (non-continuous): Used for accessing the User's approximate device location. Rolo may collect, use, and share User location Data to provide location-based services. The geographic location of the User is determined in a manner that isn't continuous, such as sharing a specific location to the participants of a Conversation.
- Biometric Data access permission: Used for accessing the User's biometrical Data and/or authentication systems, such as FaceID, to unlock the Rolo app or specific data/features within it.
- Microphone permission: Allows accessing and recording microphone audio from the User's device. This, for example, enables our Users to have audio calls with other participants in a Conversation. Rolo does not use the recording feature unless directly activated by the User.
- Camera permission: Used for accessing the camera or capturing images and video from the device. This, for example, enables our Users to have video calls with other participants in a Conversation. Rolo does not save or record the camera output without additional permissions granted.
- Phone permission: Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the "phone state", which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls. This, for example, might be used for measuring the quality of the User's network connection when on a call.

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- Bluetooth sharing permission: Used for accessing Bluetooth-related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices, such as connecting to devices and individual's devices within proximity.
- Calendar permission: Used for accessing the calendar on the User's device, including the reading, adding, and removing of entries. This, for example, enables Users to schedule calls with their contacts.
- Reminders permission: Used for accessing the Reminders app on the User's device, including the reading, adding, and removing of entries. This, for example, enables Users to remind themselves of upcoming scheduled calls with their contacts.
- Push notifications: Rolo may send push notifications to the User to achieve the purposes outlined in this Privacy Policy. Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for Rolo, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of Rolo.

Information we collect about you

Information automatically collected when you use our Services, for example:

1. technical information, including the Internet protocol (IP) address used to connect your computer or device to the Internet and your User Account information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device hardware;
2. details of any transactions, purchases, and payments you made via our Services; and
3. information about your usage of our Services, including the full Uniform Resource Locators (URLs), clickstream to, through, and from our Services (including date and time), questions you ask, and your answers to questions, products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call us; and

Information we receive from third-party services

We work with third-party services and we may receive information about you from technical, payment, and delivery services, advertising networks, analytics providers, social networks or search information providers.

Organization Data

When you create or join an Organization, you might provide us with certain information about the Organization ("Organization Data") including its names, descriptions of the nature of its

business, places of business, URLs of websites and social channels, logos, photos and more. We may also research and gather additional information about the Organization from its official website, social channels, and other marketing materials, as well as from any governmental agencies and associations (such as industry associations and chambers of commerce) that it belongs to.

Communicated Data

When you enter a chat with one or more participants on Rolo, those conversations are all end-to-end encrypted by default. This means that by default, Rolo Innovation has no access to your messages, whether words, images, or files (your "Communicated Data").

Communicated data belongs to all User Accounts and Organizations participating in that conversation

When a Conversation happens between one or more User Accounts within our Services, a copy of any "Communicated Data" (Whether those are words, images, files, or any other communicated content) may be made for each User Account that is participating in the Conversation. If any of these User Accounts are part of an Organization, a copy of that Communicated Data may also be made available to the Administrators of those respective Organizations. The copy of that Communicated Data held by those participating User Accounts and Organizations may not be deleted upon termination of your User Account or Subscription, or up your deletion of the Conversation or direct deletion of any Communicated Data. The copy of that Communicated Data may continue to exist as long as those User Accounts and Organizations that received a copy of the Communicated Data maintain active Subscriptions for our Services. THIS DOES NOT GRANT THE OTHER USER ACCOUNTS OR ORGANIZATIONS THAT PARTICIPATE IN CONVERSATIONS WITH YOU ANY RIGHTS TO INTELLECTUAL PROPERTY YOU MAY SHARE WITH THEM OVER OUR SERVICES.

When we process your Communicated Data

You own all your Communicated Data, however subject to the [Terms](#) and conditions of the Contract, Users and Organizations (for themselves and all User Accounts belonging to them) grant us a worldwide, non-exclusive, license to access, use, process, copy, distribute, perform, export and display all Communicated Data, only as reasonably necessary:

- to provide, maintain and update the Services and specific features (such as automated translation of your messages or scanning URLs);
- to prevent or address service, security, support, or technical issues;
- to aggregate data to generate analytics that help us better understand and improve our Services;
- as required by law; and
- as expressly permitted in writing by Users.

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User represents and warrants that it has secured all rights in and to Communicated Data as may be necessary to grant this license to Rolo Innovation.

Reporting third-party IP infringement

To report claims of third-party copyright, trademark, or other intellectual property infringement, please email help@rolo.chat. We may terminate your User Account if you repeatedly infringe the intellectual property rights of others.

Reporting illegal use or inappropriate content

If you discover any use of our Services that is deemed illegal in your country or if you see inappropriate content being shared in Conversations, please email help@rolo.chat. We may terminate your User Account if you repeatedly share inappropriate content or use our Services for anything considered illegal in your country.

Why we process your User Data

Your User Data is collected to allow Rolo Innovation to provide our Services, comply with our legal obligations, respond to enforcement requests, protect our rights and interests (or those of our Users or third parties), detect any malicious or fraudulent activity, as well as the following: Managing contacts and sending messages, User database management, handling payments, registration and authentication, analytics, contacting our Users, device permissions for User Data access, content performance and features testing (A/B testing), data transfer outside the EU, backup saving and management, hosting and backend infrastructure, platform services and hosting, traffic optimization and distribution, social features, infrastructure monitoring, location-based interactions, beta testing, and handling finance and accounting.

How we process your User Data

Rolo Innovation takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of User Data.

The Data processing is carried out using computers, servers, and/or IT-enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to Rolo Innovation, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Rolo (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. An updated list of these parties may be requested from Rolo Innovation at any time.

Where we store & process your User Data

Your User Data is processed at our offices and in any and in any other places where the Data Processors involved in the processing are located.

Depending on the User's location, data transfers may involve transferring their User Data to a country other than their own.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by Rolo Innovation to safeguard their Data.

Our Services use a variety of web hosts and third-party services to store and process your User Data and run specific features or parts of Rolo. Some of these third-party services may work through geographically distributed servers, making it difficult to determine the actual location where your User Data is stored and processed. However, you can anticipate that your User Data will at times be stored and processed in France, Singapore, Taiwan, the UK, and the USA.

Rolo Innovation is allowed to transfer User Data collected within the EU to third countries (i.e. any country not part of the EU) only according to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for the establishment, exercise or defense of legal claims;
- the transfer is necessary to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent. In such cases, the Owner shall inform the User about the legal bases the transfer is based on via Rolo.

If this is the legal basis, the Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of appropriate safeguards. In such cases, the Owner shall inform Users appropriately and collect their explicit consent via Rolo.

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For any questions regarding where your User Data is stored, please contact Rolo Innovation's Data Protection Officer (DPO), Noe Charmet: privacy@rolo.chat.

Who processes your User Data

While Rolo Innovation is primarily responsible for processing your User Data, we may share your data with multiple third parties for processing your User Data depending on the Rolo features you activate. We only provide these third parties with as much of your User Data as is reasonably required for them to effectively process it for our agreed purposes.

Hosting & backend infrastructure

Key components of Rolo Innovation's Services are hosted, run, and backed up on Google Cloud Platform, run by Google LLC on servers in Taiwan, although some specific features may work through geographically distributed servers, making it difficult to determine the actual location where your User Data is stored. The software, databases and code on these servers are maintained by Rolo Innovation Inc., and Google LLC has no access to your User Data.

Analytics

The services contained in this section enable Rolo Innovation to monitor and analyze usage of our Services to improve their stability and solve User's technical issues:

- Google Analytics for Firebase (Google LLC)
Place of processing: USA
Privacy policy: policies.google.com/privacy
User Data processed: Application opens; Application updates; device information; first launches; geography/region; In-app purchases; the number of sessions; the number of Users; operating systems; session duration; unique device identifiers; Usage Data.
Additional Note: To understand Google's use of Data, consult Google's partner policy: www.google.com/policies/privacy/partners
- Firebase Crashlytics (Google LLC)
Place of processing: USA
Privacy policy: policies.google.com/privacy
User Data processed: Application opens; Application updates; device information; first launches; geography/region; In-app purchases; the number of sessions; the number of Users; operating systems; session duration; unique device identifiers; Usage Data.
Additional Note: To understand Google's use of Data, consult Google's partner policy: www.google.com/policies/privacy/partners

Platforms for system messages, technical support, and marketing purposes

The services in this section enable Rolo Innovation to manage a database of email contacts, phone contacts, or any other contact information to communicate with our Users outside of Rolo. These services may also collect Data concerning the date and time when the message

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was viewed by the User, as well as when the User interacted with it (such as by clicking on links included in the message). These types of services may also allow Rolo Innovation to build user profiles by starting from an email address, a personal name, or other information that the User provides to Rolo. This Personal Data may also be matched with publicly available information about the User (such as social network profiles) and used to build private profiles that Rolo Innovation can use for improving its customer support. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Rolo.

- SendinBlue (SendinBlue SAS)
User Data processed: First name; last name; email address; phone number; language; country; contact preferences; date of signup to Rolo; User opens of and interactions with messages.
Place of processing: France
Privacy Policy: www.sendinblue.com/legal/privacypolicy
- HelpWise (SaaS Labs US Inc.)
User Data processed: Email address; first name; last name; phone number; language; location; devices used with Rolo; company; job title; social profiles.
Place of processing: USA
Privacy Policy: helpwise.io/privacy
- Helpy (Helpy.io Inc.)
User Data processed: User interactions with articles.
Place of processing: USA
Privacy Policy: support.helpy.io/en/knowledgebase/13/docs/61-privacy-policy

Sign up and authentication

By signing up to or authenticating to Rolo, Users allow Rolo Innovation to identify them and give them access to our services. In some cases, third parties may provide sign-up and authentication services to our Users. In these cases, Rolo will be able to access some User Data, stored by these third-party services, for sign-up or identification purposes. Some of the services listed below may also collect User Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

- Auth0 (Auth0 Inc.)
User Data processed: Email address; first name; last name; password; profile picture; tracker; other types of User Data as specified in their Privacy Policy.
Place of processing: European Union
Privacy Policy: auth0.com/privacy
- Sign in with Apple (Apple Inc.)
User Data processed: Email address; first name; last name; phone number; User ID.
Place of processing: USA
Privacy Policy: www.apple.com/legal/privacy
- LinkedIn OAuth (LinkedIn Corp.)
User Data processed: Email address; first name; last name; profile picture; other types of

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User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: www.linkedin.com/legal/privacy-policy

- Google OAuth (Google LLC)

User Data processed: Email address; first name; last name; profile picture; other types of

User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: policies.google.com/privacy

- Microsoft OAuth (Microsoft Corp.)

User Data processed: Email address; first name; last name; profile picture; other types of

User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: privacy.microsoft.com/en-us/privacystatement

- Salesforce OAuth (Salesforce.com Inc.)

User Data processed: Email address; first name; last name; profile picture; other types of

User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: www.salesforce.com/company/privacy/full_privacy/

Interactions between platforms

Some features of Rolo, such as the sign-up process and inviting users to Rolo require the use of special links generated by third parties to manage the User journey to and within Rolo.

- Firebase Dynamic Links (Google LLC)

User Data processed: The sharing and opening of such links; other types of User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: policies.google.com/privacy

Handling payments

Unless otherwise specified, Rolo processes any payments by credit card, bank transfer, or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Rolo isn't involved in the collection and processing of such information: instead, it will only receive a notification from the relevant payment service provider as to whether payment has been completed. These payment providers include:

- Stripe (Stripe Inc.)

User Data processed: Email address; first name; last name; payment details; other types of User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: stripe.com/privacy

- Android Pay (Google LLC)

User Data processed: Email address; first name; last name; payment details; other types

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of User Data as specified in their Privacy Policy. Place of processing: United States

Place of processing: USA

Privacy Policy: www.google.com/policies/privacy

- Apple Pay (Apple Inc.)

User Data processed: Email address; first name; last name; payment details; other types of User Data as specified in their Privacy Policy.

Place of processing: USA

Privacy Policy: www.apple.com/legal/privacy/en-ww

Distribution platforms

When you download Rolo to your devices, you may do so from a third-party app marketplace. These services provide a wide range of tools to Rolo Innovation e.g. analytics, user registration, commenting, database management, e-commerce, payment processing that require the collection and handling of User Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored, but we have indicated the primary jurisdiction(s) for that processing.

- Apple App Store (Apple Inc.)

Personal Data processed: Usage Data.

Place of processing: USA

Privacy Policy: www.apple.com/legal/privacy

Additional note: By being distributed via the Apple App Store, Apple collects basic analytics and provides reporting features that enable Rolo Innovation to view usage analytics data and measure the performance of Rolo. Much of this information is processed on an opt-in basis. Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on support.apple.com/en-us/HT202100

- Google Play Store (Google LLC)

Personal Data processed: Usage Data.

Place of processing: USA

Privacy Policy: policies.google.com/privacy

Additional note: By being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis. Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on this page.

Beta testing platforms

We invite some of our Users to Beta test early versions of Rolo before they're released. Using these third-party platforms makes it possible to manage User access to Rolo, or parts of it, to test a certain feature or the entire Application. These service providers may automatically collect data related to crashes and statistics related to the User's use of Rolo in a personally identifiable form.

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- TestFlight (Apple Inc.)
Personal Data processed: App information; country; Data communicated while using the service; date of birth; device information; device logs; email address; first name; gender; last name; phone number; Tracker; Usage Data; username; various types of Data as specified in the privacy policy of the service.
Place of processing: USA
Privacy Policy: www.apple.com/legal/internet-services/itunes/testflight/sren/terms.html
- Google Play Beta Testing (Google LLC)
Personal Data processed: First name.
Place of processing: USA
Privacy Policy: policies.google.com/privacy

How long we retain your User Data

Your User Data is stored with us as long as you maintain a User Account with us. If we receive a request to delete your User Account, we will also delete your User Data associated with your User Account from any third parties it was shared with.

Often this deletion will happen immediately, but as some services may maintain backups of your User Data, some of that data may continue to exist for up to 45 days.

If your User Account was owned by an Organization or you participated in a Conversation with other Rolo Users, some of your basic User Data (such as your name, job title, and organization) may be retained by those other Rolo Users and the Organizations their User Accounts belong to, to provide them with accurate records of their Conversations with you.

Compelled access or disclosure to your User Data

If compelled or required by law to provide access or disclosure of your data, it will be limited to the data we have access to. This data would typically include your User Data and Organization Data. So long as you maintain your Conversation Passcodes, we can only hand over encrypted Communication Data to any legal authorities. We will provide you with prior notice of the compelled access or disclosure to the extent we are legally permitted to do so.

Your rights

Users may exercise certain rights concerning how their User Data, Organization Data, and Communication Data (together “Data”) are processed by us.

In particular, Users have the right to do the following:

- Withdraw your consent for Data processing: You can withdraw your consent for our processing of your Data after having already given it. Please note that withdrawal of

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consent for the processing of your data may result that some or all of our Services may no longer work for you.

- Object to the processing of your Data: You have the right to object to the processing of your Data if it is carried out on a legal basis other than consent. Please note that objecting to the processing of your data may result that some or all of our Services may no longer work for you.
- Access your Data: Check what User Data we hold about you, how it is processed, and how it is used, and request a machine-readable copy of any User Data we hold about you that can be transferred to another Data Controller.
- Verify and correct your data: You can require us to correct, complete or update any inaccuracy or error in any User Data we hold about you;
- Delete your Data: You can require us to delete any User data we hold about you if it is inaccurate, incomplete, equivocal, or expired, cease further dissemination of that Data, and no longer have it processed by third-party services that we have disclosed it to; and
- Lodge a complaint: You have the right to bring a claim to your competent data protection authority.

Details about the right to object to processing

Users may object to the processing of their User Data for direct marketing purposes at any time by disabling marketing options in the Settings of their Rolo app.

Where User Data is processed in aggregate for the public interest, at the request of a government authority or for Rolo Innovation's legitimate purposes (such as analytics), Users may object to such processing by providing a reason related to their particular situation to justify the objection. To exercise these rights, please email our Data Protection Officer (DPO), Noe Charmet: privacy@rolo.chat. These requests can be exercised free of charge and will be addressed by us as early as possible and always within one month.

Changes to our Privacy Policy

We may make changes to this Privacy Policy from time to time by posting the updated Privacy Policy here. If you have subscribed to our Services, by providing an email address, we will also notify you of any material changes. Your continued use of our Services will be considered acceptance of any such changes.

Additional information for Users residing in California

The provisions contained in this section additionally apply to all Users who are Users (sometimes referred to as "Consumers") residing in the state of California, USA. According to "The California Consumer Privacy Act of 2018", and, for such consumers, these provisions

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supersede any other possibly divergent or conflicting provisions contained above in the Privacy Policy where the term User Data was used.

This part of the document uses the term “Personal Information” as it is defined in The California Consumer Privacy Act (CCPA).

Categories of Personal Information collected, disclosed or sold

We have collected the following categories of Personal Information about you: identifiers and internet information. We will not collect additional categories of Personal Information without notifying you. We collect the aforementioned categories of Personal Information, either directly or indirectly, from you when you use our Services.

For example, you directly provide your Personal Information when you submit requests via any forms on our Services. You also provide personal information indirectly when you navigate our Services, as Personal Information about you is automatically observed and collected. Finally, we may collect your personal information from third parties that work with us in connection with Rolo or with the functioning of our Services and features thereof.

How we use the Personal Information we collect: sharing and disclosing of your personal information with third parties for a business purpose

We may disclose the Personal Information we collect about you to a third party for business purposes. In this case, we enter a written agreement with such a third party that requires the recipient to both keep the Personal Information confidential and not use it for any purpose(s) other than those necessary for the performance of the agreement. We may also disclose your Personal Information to third parties when you explicitly ask or authorize us to do so, to provide you with our Services. To find out more about the purposes of the processing of your Personal Information, please refer to the relevant sections of this document.

We may use your Personal Information to allow the operational functioning of our Services and features thereof (i.e. “Business Purposes”). In such cases, your Personal Information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We will not use your personal information for different, unrelated, or incompatible purposes without notifying you.

Sale of your Personal Information

For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer’s Personal Information by Rolo Innovation to another business or

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a third party, for monetary or other valuable consideration". By this definition, Rolo Innovation does not sell any of your Personal Information.

Your rights as a resident of California

You have the right to request that we disclose to you:

- the categories and sources of the Personal Information that we collect about you, the purposes for which we use your Personal Information and with whom such information is shared;
- in case of disclosure or sale of Personal Information for a business purpose, we will provide two separate lists where we disclose:
 - for disclosures for a business purpose, the Personal Information categories obtained by each category of recipient; and
 - for sales, the Personal Information categories purchased by each category of recipient.

The disclosure described above will be limited to the Personal Information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

You have the right to request that we delete any of your Personal Information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on our Services, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights, etc.). If no legal exception applies, as a result of exercising your right, we will delete your Personal Information and direct any of our service providers to do so.

How to exercise your rights

To exercise the rights described above, you need to submit your verifiable request to us by contacting Rolo Innovation's Data Protection Officer (DPO), Noe Charmet on privacy@rolo.chat.

For us to respond to your request, we must know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State

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to act on your behalf. If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority. You can submit a maximum number of 2 requests over 12 months.

How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request. We will respond to your request within 30 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request. Our disclosure(s) will cover the preceding 12 month period. Should we deny your request, we will explain to you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Additional information for Users residing in Brazil

The provisions contained in this section additionally apply to all Users who are Users residing in Brazil according to the "Lei Geral de Proteção de Dados". For such Users, these provisions supersede any other possibly divergent or conflicting provisions contained in the Privacy Policy where the term "User Data" was used.

This part of the document uses the term "Personal Information" as it is defined in the Lei Geral de Proteção de Dados (LGPD).

When we process your Personal Information

We process your Personal Information solely if we have a legal basis for such processing. Legal bases are as follows:

- you consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements, and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized Personal Information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract (such as Rolo Innovation's [Terms of Use](#));
- the exercising of our rights in judicial, administrative, or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;

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- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact Rolo Innovation's Data Protection Officer (DPO), Noe Charmet: privacy@rolo.chat

To find out what categories of your personal information are processed, you can read the section titled "User Data" within this document.

To find out why we process your personal information, you can read the sections titled "How we process your data" within this document.

Transfer of Personal Information outside of Brazil permitted by the law

Besides our transfer of your Personal Information to territories which are necessary for the smooth operation of our Services as detailed in the section titled "Where we store & process your User Data", we are allowed to transfer your Personal Information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation, and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative, or arbitration procedures.

Your rights as a resident of Brazil

You have the right to:

- obtain confirmation of the existence of processing activities on your Personal Information;
- access your Personal Information;
- have incomplete, inaccurate or outdated Personal Information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive Personal Information, or of Personal Information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;

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- obtain information about the third parties with whom we share your Personal Information;
- obtain, upon your express request, the portability of your Personal Information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your Personal Information being processed if the processing was based upon your consent, unless one or more exceptions provided for in Article 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely based on the automated processing of your Personal Information, which affect your interests. These include decisions to define your personal, professional, consumer, and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to exercise your rights

You can file your express request to exercise your rights free from any charge, at any time, by you or your legal representative emailing Rolo Innovation's Data Protection Officer (DPO) Noe Charmet: privacy@rolo.chat.

How and when we will respond to your request

We will strive to promptly respond to your requests. In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests

In cases where we are not processing your Personal Information, we will indicate to you the physical or legal person to whom you should address your requests if we are in the position to do so.

If you file an access or Personal Information processing confirmation request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead. In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not

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records exist, any criteria used for the processing, and the purposes of the processing, while safeguarding our commercial and industrial secrets.

If you file a rectification, deletion, anonymization, or personal information blocking request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.