

## **IngZ, Inc. Privacy Policy**

Date of last revision: July 1, 2010

### **Statement of purpose:**

IngZ, Inc. (hereafter “IngZ”) values our users and has established a standard of care to handle information you provide to us and we provide to you via our products and services. This Policy outlines how will use and protect this information. We will never rent or sell your information to third parties for any use. We may at times share this information to make the services more enjoyable or usable or for the security of you and others users. We may also use this information to generate advertising campaigns for ourselves or our partners. We pledge to use this information to in compliance with this policy and as per our user agreement and terms of service. We will strive at all times to follow this policy and institute industry best practices in regards to our users information. However, this document is not meant to be all inclusive of any procedures or policies we may put in place to protect your information.

### **Information you provide us:**

IngZ will routinely accept information from users to provide services via its various applications (“apps”) and websites. This document provides our standard of care for that information and its use. Most of our products and services will allow for use with minimal or no registration. The information gathered in these cases (username, email and password) is the minimal required in order to provide services to you. In some cases, we may collect additional personal information needed to identify you for purposes of payment, tax reporting, etc. We also collect certain information not implicitly provided by you, but gathered automatically by our software such as IP address, mobile number, etc. We may also collect data from your visits and activity in order to better target advertising for ourselves or our advertising partners. Finally, we may collect information necessary to enforce our terms of service which every user agrees to.

This information will always be held in the strictest confidence possible and only shared with other entities under the conditions listed below or as required by law.

Some information provided in the social network features of our products may become available to other users of the products and services or become public information via our website and search engines. This includes basic user information such as usernames, ranks, etc. This is an essential and necessary as part of any social networking product. We will make it clear when information could be published within our products, on our site or elsewhere. Generally, the information provided via the social networking features will not be personally identifiable though we cannot control this. For instance, someone could use their real name as their username, thus exposing their real name when it appears as a username. We will always strive to apply the more stringent protections on your personal data whenever possible.

### **Social networking information:**

Ingz may collect additional information from you to be used in the social networking features of our products. This may include location, avatar, pictures and other personal information. Providing the social networking information will always be optional and this information will be only shared

with other users on an “Opt-in” rather than an “Opt-out” basis.

### **Location aware information**

Many of IngZ’s products may use GPS or other location aware services to find your specific location and use it within an app. This information will be kept secure and only used for the purposes listed in this policy. By use of our products and services and accept of our terms of service, users consent to the collection and use of this information.

### **Financial information.**

IngZ may collect financial information from you in order to facilitate a payment from you or to make a payment to you in return for services provided (i.e. content). In these cases, IngZ pledges not to share this information with any other party, other than those required to complete the transaction (credit card companies, banks, IRS, etc). We will hold this data in the strictest of confidence and use all technologies (SSL, encryption, etc) to keep it safe both at rest and in transit. We will retain such information only as long as is required.

### **Metadata in files provided to us**

Information may be associated with files you upload to us that isn’t immediately obvious but can reveal information about you that you may not want public. For instance, some photo programs append the author and other information into the picture file. Please take care to remove this information from the files you upload if you don’t want to release this information. We will still attempt to protect this information to the extent that we can but cannot be responsible for information disclosed in this manner.

### **Cookies**

We may use cookies, web beacons, clear gifs, session keys and other data files and processes that contain some information we can tie to your account. We use this information to keep you logged in, make your navigation process smooth or other usability features. For instance, with your consent, we will keep you logged in to a site or app to prevent you from having to provide this information each time. This will be on an Opt-in basis and users may opt to log in each time they use the app or site. This may limit some functionality within the site or app. They may also be used in advertising functions for ourselves or our ad partners. These cookies or files will follow best practices for such items and will store the minimal amount of information needed. They will also be deleted or anonymized as soon as they are no longer needed.

### **Tracking and Logs**

IngZ will keep logs of your access and activity within our various products. This may include information specific to your machine and ISP (IP address, MAC address, mobile phone number, etc) as well as times of access and activities performed. We will store the minimal required by law but also may keep additional details for the security of our others users and system. We may also generate over all statistics of use using these logs for system

administration and advertisers. In such cases, we will never reveal specific information that could identify you individually.

## **Offensive Content**

We offer user generated content so occasionally a user will attempt to upload images, text or other content that may be objectionable to some users. When we find it or are notified of it, we will remove content that is obscene or pornographic, by our judgment and at our discretion. Also per our terms of service, abusive conduct or language is prohibited on our systems. While we make a best efforts to monitor the system for such material, occasionally some may slip through and users are advised this may happen and to file an abuse complaint if they encounter such material or conduct on our system so we may take appropriate action.

## **Intellectual property protection**

We honor and respect all copyright and trademark protections as outlined by U.S. Law. We have an editing and filtering process to keep copyrighted information from being placed on our site. However, due to the user-based nature of our authoring process, some may slip though our system. We have a process by where owners of intellectual property can contact us and ask that content owned by them can be removed from our site and products by emailing [abuse@ingz-inc.com](mailto:abuse@ingz-inc.com). We will do so as quickly as possible and also allow the author an appeals process to show us if our removal was in error.

## **Information provided to us from third parties**

In some instances, IngZ may receive information from third party companies regarding you or your activity. Generally this will be related to advertisers or other third party programs. We pledge to treat this information with the same standard of care as that gathered directly from you. This policy will cover any such information except where noted.

## **Third party programs**

In some cases you may interact via our sites or products with programs designed by other companies. In these cases, our privacy policy does not apply and we are not responsible for any information you exchange or get from these programs or companies. Please review their privacy policies and terms of service to ensure that you are comfortable with how they are handling your information.

## **Legal requirements.**

IngZ follows and meets all legal requirements with regarding to access log retention, email records and financial reporting in the country of collection (The United States for purposes of this policy). We will provide information that we have on users when required by subpoena or other court order. We will also report all revenues and payments made to our partners and users to taxing authorities as required by law.

## **Information from minors.**

IngZ does not knowingly accept registrations from individuals under 18. We will also take special precautions to prevent registrations from children under 13 as

required by law.

## **User Best practices**

Via our user agreements, websites and FAQs, we encourage our users to be careful about information revealed inadvertently and to use good practices for online and offline behaviors. Wherever possible, we will implement technical measures and policies to help users keep their information safe.

## **Information Security**

### **Password security**

We require passwords to have a minimal complexity and only store passwords in our databases in hashed (encrypted) format so that even our technicians cannot read your password. We also implement password and login recovery procedures so as to prevent account fraud and misuse. Subscription processes are developed to prevent fraudulent users and spammers on the system. Finally, we have a support email to send any account abuse complaints to ( [HYPERLINK "mailto:abuse@ingz-inc.com" abuse@ingz-inc.com](mailto:abuse@ingz-inc.com) ) which will be acted on and resolved promptly.

### **SSL**

We will use the web standard for encryption, Secure Sockets Layer (SSL) whenever sensitive information is transmitted from a webpage (login, payments, etc). We will use the higher level ciphers and key size for SSL that our and the user's software will support.

### **General IT practices**

IngZ will strive to implement via policy, procedures and technical controls, industry best practices when it comes to the security of its systems and networks. IngZ attempts to conform with ISO 17999 and 27001, the international standards for information security in all its products and services

### **Removing information and reporting abuse**

IngZ will remove any information from its system that a registered user requests, with the knowledge that this may disable some or all features on that users account. It will also remove information on non-users posted by users without that persons consent. Such complaints should be directed to [abuse@ingz-inc.com](mailto:abuse@ingz-inc.com).

### **Scope**

This policy covers all IngZ sites, apps and products. However it does not cover third party products or sites accessed through our applications or via the web. Any third party web sites accessed or linked to via our app or advertisements appearing in our products are not covered under this policy. Please approach those entities for their specific privacy policy.

It covers any information gathered from customers/users or information provided by third parties to us regarding those users. We may change the provisions in this

privacy policy from time to time to conform to new laws or when adjusting our partnerships or business practices. Notice of changes will be posted on our website at [HYPERLINK "http://ingz-inc.com/privacy"](http://ingz-inc.com/privacy) <http://ingz-inc.com/privacy> and the latest version of the policy will always be available there.

## **Warranty**

While we take all reasonable measures to comply with this policy, we cannot ensure that your information will be 100% secure due to hackers, disgruntled employees, acts of God, etc. Compliance with this policy is offered on a “best efforts” basis. This is not a contractual agreement to provide any level of security for your data as breaches of personal information may occur on any system in spite of best practices and best efforts. We commit to provide timely notification of any customers whose information is involved in any information leak or breach.

## **Contact:**

For more information or questions on this policy or to request a copy, please email [HYPERLINK "mailto:privacy@ingz-inc.com"](mailto:privacy@ingz-inc.com) [privacy@ingz-inc.com](mailto:privacy@ingz-inc.com) or write:

Privacy Policy

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