

## OCTAPP PRIVACY POLICY

This policy discloses the privacy practices for Octapp, an Application owned and operated by My New Leaf, Inc. Octapp understands the importance of privacy when it comes to an individual's personal information. We take protecting your privacy very seriously, and we are committed to protecting your information. We understand that in order for our company to succeed our users need to have confidence in the privacy of their sensitive information.

Octapp must collect and, in some cases, disclosure information about you. We collect your personal information because it is essential for us in order to deliver the superior level of customer service that makes this Application unique. It enables us to give you convenient access to our product, updates, announcements, which we hope makes your use of the Application a positive experience.

This Privacy Policy describes the information we collect about you and what may happen to that information. By accepting this Private Policy, and the accompanying End-User License Agreement, you expressly consent to our use and disclosure of your personally identifiable information in accordance with this Privacy Policy. Octapp reserves the right to revise, amend, or modify this policy at any time and in any manner. Your use of our Application after such changes are implemented constitutes your acknowledgement and acceptance of these changes. Please refer to this policy prior to every use for changes.

### Information Collected

**Registration Information.** To fully use the services provided by the Application, you will need to register with Octapp. This includes contact information and certain other personal information, namely, name, telephone number, e-mail address and date of birth.

**Usage of the Application.** We automatically tract certain information about you based upon your use of the Application. We use this information to conduct internal research on our users' demographics, interests, and behavior to better understand and serve our users. This information is compiled and analyzed on an aggregate basis. This may include the use of analytic tools to understand how our customers and users use our products and services. The terms and privacy policies of such third parties shall apply and, to the extent required, prevail.

**Cookies.** In addition, we use "cookies" in certain areas of the Application. Cookies are small files that can be used to track a user's steps or automatically generate a user's password. Some features of our web site may only be available through the use of a cookie. Among other things, cookies allow you to enter our password less frequently during a session. Cookies can also help us provide information which is targeted to your interests. Cookies are stored on your hard drive, not on our site. Most cookies are automatically deleted at the end of a session. You may decline our cookies, but your use of the site may then be restricted (as noted above).

**Your Posts.** If you choose to post messages in the Application's portal, we will collect such information about you as you choose to disclose.

**Correspondence.** If you send us e-mails, letters or other personal correspondence, or if other users or third parties send us correspondence about your activities or postings on the web site, we may collect such information into a file specific to you.

### Our Use of Your Information

**Service Requests.** We use information about you in order to perform the services that you are requesting. For example, if you were to send information to us regarding your use of the Application, we would use that information to contact you about your use of the Application.

**Administrative Notices, Etc.** We use your e-mail address, your mailing address, and phone number to contact you regarding administrative notices, new product offerings and communications relevant to your use of the site. If you do not wish to receive these communications, you may have the ability to opt out on your account page. We may transfer your Personal Information to our local or foreign subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries (including US). We require that these parties agree to process such information in compliance with this Privacy Policy.

**Dispute Resolution.** We use information in the file we maintain about you, and other information we obtain from your current and past activities on the Site, and resolve disputes, troubleshoot problems and enforce our User Agreement.

**Internal Purposes.** Octapp wants to provide users with the best experience possible. In order to accomplish this, your use of the Application may be used in order to allow us to better operate and improve our services. Octapp may use your information to send you marketing/advertisement communications that we believe may interest you, to contact you in connection with the Services and certain programs or offerings that you may have registered for, and to identify and authenticate your access to the parts of the Services that you are authorized to access.

### Our Disclosure to Third Parties

We use practices that are consistent with standards in the industry to protect your privacy. We cannot, however, promise that your personally identifiable information or private communications will remain private. For example, third parties may unlawfully intercept or access transmissions or private communications. We do not sell or rent any personally identifiable information about you to any third party. The following describes some of the ways that your personally identifiable information may be disclosed.

**Law Enforcement.** We may disclose any information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability.

**Advertisers.** We disclose aggregate information about our users to advertisers and for other marketing and promotional purposes. However, we do not disclose any personally identifying information to any of these entities.

**Supervising Professionals.** Octapp must share the information you enter into the site with your supervising professional. This is essential for the Application to have the impact that everyone wants to achieve. We provide this information with the supervising professionals only through the Application itself.

**Third Party Suppliers.** We may use third party suppliers to assist us in providing the services available through the Application. Whenever a third-party supplier desires to collect information about you, you will be notified on the involvement of the third-party supplier, and you will never be required to disclose any information to the third-party supplier. We impose contractual restrictions on the use by third-party suppliers of information concerning you, and we do not permit third party suppliers to sell your information to third parties. Third-Party Suppliers will only be utilized if we have a good faith belief that disclosure of your information is helpful or reasonably necessary.

**Future Events.** In the event that Octapp is later sold, acquired or transfers assets to a third-party, we will, to the minimum extent required, disclose information to the potential or actual third-party purchaser. Octapp also reserves the right to transfer or assign data in the event of a merger, bankruptcy or comparable event.

#### Use by You of Information

**Use Limited to Site-Related Communications.** Because of the nature of the services offered on the Application, Octapp does not allow you to access other users' contact information. Under no circumstances can you disclose personally identifiable information about another user to any third party without our consent and the consent of such other user after adequate disclosure. Note that law enforcement personnel, VeRo program participants, and other rights holders are given different rights with respect to information they access.

**No Spam.** Octapp and our users do not tolerate spam. Therefore, without limiting the foregoing, you are not licensed to add Octapp or any users to your mail list (e-mail or physical mail) without their express consent after adequate disclosure.

#### Use by Children

Octapp is designed to be used by juveniles. However, you must be at least thirteen (13) years old to use the Application. If you are under the age of thirteen (13) (i.e., twelve years old or less), you are not permitted to download or use the Application. If you are a User the age of thirteen (13) and eighteen (18) years then, prior to installing the Application, you must first review this Agreement with your parents to make sure that you and your parents understand its terms and conditions and agree to them. If we become aware of a child under the age of thirteen (13) using the Application or a child under the age of eighteen (18) using the Application without parental consent, we reserve the right to suspend the infringing account without limiting our remedies in law or in equity.

### Deleting Your Account

Should you ever decide to delete your Account, you may do so by emailing us at [help@mynewleaf.co](mailto:help@mynewleaf.co). If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, to the maximum extent permitted by law, given the nature of certain features of the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

### Interaction with Third Party Products

The Services may enable you to interact with or contain links to third-party websites, software Applications and services that are not owned or controlled by us (each a "Third-Party Service"). We are not responsible for the privacy practices or the content of such Third-Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms, conditions, and privacy policy of each Third-Party Service that you choose to use or interact with.

### Log Files

We make use of log files originating from the Application. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages, error logs and any other information your browser may send to us. We may use such information to analyze trends, administer the Services, track users' movement around the Services, and gather demographic information.

### Access/Accuracy

In order for Octapp to operate as intended, it is important for us to maintain accurate personal information about the user. If you would like to delete or correct any of your other personal Information that we may be storing, you may submit an access request by sending an email to [help@mynewleaf.co](mailto:help@mynewleaf.co). Your email should include adequate details of your request.

## California Privacy Rights

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [help@mynewleaf.co](mailto:help@mynewleaf.co). Please note that we are only required to respond to one request per customer each year.

### Deletion of Content From California Residents

If you are a California resident under the age of eighteen (18) and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. To remove, please send an email to [help@mynewleaf.co](mailto:help@mynewleaf.co). Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

Last Updated: June 23, 2020