

Troglo LTD Privacy Policy

When you use our services, you're trusting us with your information. We understand that this is a big responsibility and we work hard to protect your information and put you in control. This Privacy Policy is meant to help you understand what information we collect, why we collect it and how you can update, manage, export and delete your information.

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What type of information we have

We collect personal data and non-personal data about you. “Personal Data” means any data that allows someone to identify or contact you. This includes the information obtained through the website at <https://troglo.co.uk>, and the Troglo mobile application, collectively the “Troglo Services”.

The following provides examples of the types of data that we collect, how we collect them, how we process it and share it. Note that not all of the Troglo Services collect all of the data listed below. By agreeing to our privacy policy, you consent to the collection of the information indicated below.

Account Credentials: We collect contact details and identifiers from you; for example, your name, email and password, which ensures we can verify your account and get in touch with news and important notices.

Device Information: We collect certain software and hardware information about your Device. For example, device and browser unique identifiers, browser type and settings, device type and settings, operating system and mobile network information.

Profile Information: You provide us with other information about you, such as your gender identity, genitals you sport, your sexual orientation and current and past sex-mood to make our interface more relevant to you and improve your Troglo experience. We also collect information about your age and ethnicity to understand the demographics of our users. We process the information you provide us about your past vaccinations, and use of pre-exposure drugs and contraception use to personalise the content and look of Troglo to your needs.

HIV and STI Status: At the recommendation of HIV prevention experts and the Troglo users, we give you the option of provide your health characteristics, such as your HIV and STI status. You should carefully consider whether you want to

disclose your status. We do not share HIV nor STI status with any third party service advertisers or third party service providers other than companies that host data on our behalf (e.g., Google Firebase). In addition, we do not use HIV status for advertising purposes and do not share this information with advertisers.

Sexual activity information: We collect information about your sexual activities to provide you with our services. This includes the processing of the date and type of activity, how you met your activity partner, where it happened and whether you enjoyed yourself and felt safe. We also process the way you address your partner, their gender and the safety precautions you used in your activity to fine tune the format of your journal and calculate your safety score.

Cookies and Log Files: We collect and process information about the apps, browsers, and devices you use to access Troglo. This includes your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.

“Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing a web site. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your Device until you delete them) to provide you with a more personal and interactive experience on the Troglo Services and to improve our marketing efforts, including through the use of targeted advertising. Persistent cookies we place may be removed by following instructions provided by your browser. If you choose to disable cookies, some areas or features of the Troglo Services may not work properly. Troglo has an interest in the collection of such information for fraud monitoring and analytics purposes.

Purchases: We collect information necessary to complete purchases. This includes, among other things, your name, credit card information, billing information, address, telephone number, and email address.

How we get the information and why we have it

Most of the personal information we process is provided to us directly by you. We use this information to provide you with our services as per our User Agreement and for our own legitimate business reasons.

Note that our third party service providers may provide certain information to us (e.g., your name, phone number, and email address):

Feedback/Support: If you provide us feedback or contact us for support we will collect your name and e-mail address and possibly other Personal Data, as well as any other content that you send to us in order to reply and address any issue. If you contact us for support, we may also collect and retain certain technical diagnostic data, such as your phone model.

Mailing List: When you sign up for the Troglo Services, we collect your email address to send you Troglo news, Troglo Services updates, the latest information on products and services, and third party offers.

Surveys: When you participate in a survey, we collect additional information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information. Unless noted otherwise, we use Google Forms for surveys.

Partner Promotion: We collect information that you provide as part of a Partner Promotion (defined below).

Third Party Platforms: If you use or connect to the Troglo Site or download the Troglo Services through a third party platform, such as Facebook, you allow us to access and/or collect certain information from your third party platform profile/account. We may also access information contained in cookies placed on your Device by the third party platform. Note that we may share this information with the third party platform for their use.

Third Party Tracking: Our advertisers also use their own cookies or other tracking technology which may collect information about you within the Troglo Services. We do not control use of these tracking technologies. We prohibit them from tracking or monitoring health information (e.g., HIV status) or certain sexual group identification, such as your safety score.

In addition to consent, the information is collected to perform a contract, to comply with obligations, or for the legitimate interests of Troglo or a third party as described below. Note that some Troglo Services collect only some of the data listed here.

What we do with the information we have

In addition to the uses described above, we use your Personal Data in the following ways:

Identify You: To identify you as a user on the Troglo Services.

Provide Products and Services: To provide the products and services you request, including the Troglo Services.

Improve Services: To improve the Troglo Services.

Communicate with you: To respond to your inquiries related to support, employment opportunities, or other requests, and to send Promotional Emails to those users that request or authorise them.

Partner Promotions: To conduct a Partner Promotion that you request.

Marketing and Advertising: For marketing and promotional purposes, including to inform you of products, services or offers of Troglo, our related companies or business partners that may be of interest to you. Marketing and advertising material provided by Troglo may appear within our App, on our website, on Apps owned by third parties, or on websites controlled by third parties. The marketing and advertising may relate to Troglo's products or

services, or may relate to the products or services of companies that have asked us to advertise to you.

Administration: For internal administrative purposes, as well as to administer or manage our relationship with you, including to communicate with you regarding your use of Troglo Services.

Employment: If you apply for employment with Troglo or currently work for Troglo, to manage your employment application, assess your qualifications, and manage your employment with us (applies solely to the Troglo Site).

What we share

In addition to the specific situations discussed above, we disclose Personal Data in the following situations:

User Profiles: The Troglo App is a journaling platform that is designed to allow users to record information.

Third Party Tracking Companies: We share your hashed Device ID, Profile Information, and demographic information with analytics partners. These third parties may also collect information directly from you as described in this Privacy Policy. The privacy policy of these third party companies applies to their collection, use and disclosure of your information. For example, one of our partners is Google Analytics which collects information and report website trends without identifying individual visitors.

Third Party Advertising Companies: We share your hashed Device ID, your device's advertising identifier, a portion of your Profile Information, and some of your demographic information with our advertising partners. These third parties may also collect information directly from you as described in this Privacy Policy through technology such as cookies. The privacy policy of these third party companies applies to their collection, use and disclosure of your information.

Third Party Service Providers: We share your Personal Data with third party service providers to: provide you with the Troglo Services; conduct quality assurance testing; provide technical support; and/or to provide other services to Troglo. Except as otherwise stated in this Privacy Policy, these third party service providers are required by contract not to use your Personal Data other than to provide the services requested by Troglo. We do not, however, provide HIV status to our third party service providers, other than companies that host data on our behalf (e.g., Google Firebrand).

Partner Promotion: We offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.

Affiliates and Acquisitions: We may share your Personal Data with our parent company, any subsidiaries, joint ventures, or other companies under common control. If another company acquires our company, business, or our assets, that company will possess the Personal Data collected by us and will assume the

rights and obligations regarding your Personal Data as described in this Privacy Policy.

Other Disclosures With Your Consent: We may explicitly ask if you would like us to share your information with other third parties who are not described elsewhere in this policy. For example, we may ask you if you would like to back-up your account, or the information stored within your local device, to a third party back-up service such as Apple or Google Firestore. We may also ask you if you would like to notify your partners for you.

Other Disclosures: Troglo may disclose Personal Data in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws; to establish or exercise our rights to defend against legal claims; if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, safety of person or property, violation of our policies, or as otherwise required by law.

How We Protect Personal Information

Troglo takes steps to help protect your Personal Data from unauthorized access, use, or disclosure. That said, no method of transmission over the Internet, or method of electronic storage, is fully secure, and Troglo cannot guarantee the security of your Personal Data. In the event that we are required by law to inform you of any unauthorized access to your Personal Data, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

How we store your information

Your information is securely stored by a third party service provider in the EU.

Typically we retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required for the operation of the Troglo Services or permitted by law. You can, however, request that we delete your Personal Data. All requests must be directed to the contact in the “Contact Information” section of the Troglo Services. We can also decide to delete your data at any time if we believe that the data is incomplete, inaccurate, or that our continued use and storage are contrary to our obligations to other individuals or third parties. In addition, we may keep your Personal Data and usage history (which includes a history of profile text or photos that have been censored, banned) as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.

Your data protection rights

Under data protection law, you have rights including:

Your right of access: You have the right to ask us for copies of your personal information.

Your right to rectification: You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure: You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing: You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing: You have the the right to object to the processing of your personal data in certain circumstances.

Your right to data portability: You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

How to complain

You can also complain to the ICO if you are unhappy with how we have used your data:

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113

Applicability of this Policy:

This Privacy Policy applies to all of the services offered by Troglo LTD and services offered on third-party sites.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include Google services, be displayed to you in search results, or be linked from our services

Changes to this Policy:

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

We always indicate the date the last changes were published and we offer access to archived versions for your review.

Other Information

The following additional information relates to our privacy practices:

Permissible Age: The Troglo Services are intended for users 18 years of age and older only (twenty-one (21) years of age in places where eighteen (18) years is not the age of majority). We do not intentionally gather Personal Data about visitors who are under the age of majority. If you are aware that a child or minor has submitted Personal Data on the Troglo Services, please contact us using the information provided below so that we can take appropriate action.

Transmission Of Data To Other Countries: Your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding Personal Data may be less stringent than the laws in your country. Therefore, in some circumstances, you might be left without a legal remedy in the event of a privacy breach. By submitting your Personal Data, you agree to this transfer, storage and/or processing, including all associated risks.

Third Party Applications/Websites: We have no control over, do not review, and cannot be responsible for other websites or applications. If you click on a link to another website or third party application, the terms of this Privacy Policy do not apply.

Contact Information: Troglo welcomes your comments or questions regarding this Privacy Policy. Please contact us at the following:

Name: Troglo LTD

Address: Somerset House, Strand. London WC2R 1LA

Email: support@troglo.co.uk