

# PRIVACY POLICY

Xoopah respects your privacy and will strive to ensure that all sensitive and personal information provided to us is lawfully processed and held in our secure database. Personal/sensitive information is deemed to be any information that identifies a living individual. We want you to be aware of how we collect, and handle information covered by this Privacy Policy.

Date: May 31st 2024.

Your information privacy is important to us.

We provide this Privacy Policy to explain how we collect, use, protect, and disclose information and data when you use our website on which this Privacy Policy is posted, ("This Website"), application interfaces, and other services offered by Xoopah, and any other time you interact with Xoopah (collectively, the "Services").

This Privacy Policy also explains your choices for managing your information preferences, including opting out of certain uses of your Personal Information (defined below).

This Privacy Policy applies to all users of this Website and the Services. This Website and the Services are provided by Xoopah, Inc. ("Xoopah", "we", "our", "us").

BY USING THIS WEBSITE OR ANY OF THE SERVICES, YOU ARE CONSENTING TO THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.

## Personal Information We Collect

We may collect the following categories and types of “Personal Information”:

- Contact information: your name, email address, company name, address, telephone, and fax number
- Other identifying information: internet protocol (IP) address, online identifiers
- Financial Information: credit card number, debit card number, bank account information and other financial information
- Geolocation data.
- Internet or other electronic activity: your browsing, search and click history, including information about how you navigate within This Website and the Services and which elements of This Website and the Services you use the most, and ratings and reviews or other content you post on This Website or to the Services.
- Commercial information: products or services purchased or viewed on This Website or through the Services.
- Audio and visual information: your videos and photos, such as audiovisual content you upload to your user profile and other audio, or video recordings initiated by us; and
- Inferences drawn from the categories described above to create a profile about you to reflect your preferences, characteristics, behaviour, and attitude.

## **Message or Email Content**

We may also collect other Personal Information in the form of message or email content when you choose to link certain third-party messaging or email services (e.g., Gmail, Meta including

Facebook and Instagram) to your User Account/Profile or when you interact with these services on This Website or in connection with the Services.

By creating an account, you agree to opt in for news, feature updates, discounts and offers from Xoopah.

We may also collect other Personal Information in the form of message or email content when you choose to link certain third-party messaging or email services (e.g., Gmail, Meta including Facebook and Instagram) to your User Account/Profile or when you interact with these services on This Website or in connection with the Services.

By creating an account, you agree to opt in for news, feature updates, discounts and offers from Xoopah.

## **Sources of Collection**

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from You. For example, from forms you complete to register for a user account or create a user profile on This Website, when using the Services, or to provide feedback or suggestions about This Website or the Services. We also collect records of products or services you consider for subscription on This Website or through the Services, ask questions in our Q&A section or request quotes or contacts from businesses who advertise with us.
- Indirectly or passively from you or your computers, devices, or internet browsers. For example, This Website uses “cookies” on your browser that enable us to track

your interactions with This Website, the Services and Ads may collect geolocation from your mobile device if you search for a business “near” your current location. This activity is further described in the Cookies and Advertising and Online Tracking sections below.

- Indirectly or passively from you if you choose to link certain third-party email or messaging services (e.g., Gmail, Meta including Facebook and Instagram) to your User Account/Profile or when you otherwise interact with these services on This Website or in connection with the Services.
- From your contacts. For example, if another user chooses to use an available referral or share feature on This Website or through the Services (e.g., to send a postcard, listing, page link, contest invitation, etc. to you), we may collect certain Personal Information about you as the recipient of the shared information (e.g., name, address, e-mail address, mobile telephone number).
- From Social Networking Services. For example, if you use Facebook or Google to sign-in to your account on This Website or to the Services, we collect such information about you that you permit the Social Networking Service to share with us.
- From Service Providers that collect certain Personal Information from or about you on our behalf, such as an analytics software or platform that we use to measure and analyze traffic to This Website, the Services or interaction with our Ads.

# Purpose of Collection and How We Use Personal Information

We use your information to provide you with our Services for the following categories:

- Create and update your User Account/Profile.
- Create and manage bookings, reviews, invoices, payments and messages in the app
- Communicate with you about your request, inquiry, or registration.
- To create, maintain and secure your User Account/Profile on This Website or in connection with the Services.

**Analytical Purposes:** We use your other identifying information, internet activity and browsing history, commercial information, demographic information, and geolocation data to analyze preferences, trends, and statistics.

**Marketing and Promotional Purposes:** We use your contact information, commercial information, demographic information, internet or other electronic activity, geolocation data, and inferences to:

- • Inform you of our new products, services and offers.
- • Provide you with targeted advertising.
- • Run contests, promotions, and sweepstakes.
- • Provide you with other information from and about Xoopah, including personalized marketing communications.

- • Help us measure and understand site metrics, such as website traffic and its sources and conversions to gauge the effectiveness of online advertising.
- • Personalize your experience and to deliver you content and offers relevant to your interests, including targeted offers and ads through This Website, on third-party sites, and via email, or other similar means; and
- • Provide you with communications or notices regarding Website and Services operations, our products or services, or happenings that may be of interest to you.

**Maintenance and Improvement of This Website and the**

**Services:** We use your contact information, commercial information, audiovisual information, and internet activity and browsing history to:

- • Provide you with This Website and the Services, including to send you alerts about your account.
- • Handle your customer services requests.
- • Help us diagnose technical and service problems and administer This Website and the Services.
- • Help us to monitor and improve this Website's and the Services' performance and to make it easier for you and other users to use and manage features and programs made available through this Website and the Services.
- • Help us to better understand the functionality of our mobile applications on your phone.
- • To provide support, personalize and develop this Website or the Services.

- For A/B and other feature testing, research, analysis, evaluation, and product development, including to develop and improve this Website and the Services.

**Review and content creation purposes:** We use your contact information, commercial information, and audio and visual information to enable reviews of our products and to display content that you have created and allowed us to display on this Website and the Services and on social media.

**Security and Fraud Prevention:** We use your contact information, other identifying information, commercial information, financial information, geolocation data, audiovisual information, internet activity and browsing history, and inferences to:

- Protect this Website, the Services, databases, and other technology assets.
- Protect Xoopah and our business.
- Minimize or prevent fraudulent or bot traffic.
- Detect and prevent malicious, deceptive, fraudulent, or illegal activity on this Website or the Services.
- Protect the rights, security, and safety of Xoopah personnel and users of this Website and the Services.

We may collect additional Personal Information for a purpose and use not listed here when, for example, you sign up for a specific Xoopah Solution. If necessary, we will provide details of our collection and use of associated data during the sign-up process. Xoopah will not collect additional categories of Personal Information or use the Personal Information we

collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **Security of Your Personal Information**

The security of Your Personal Information is important to Us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Information, we cannot guarantee its absolute security.

## **Categories of Third Parties We Share Personal Information With Service Providers**

From time to time, we may establish a business relationship with other businesses whom we believe trustworthy and who have confirmed that their privacy practices are consistent with ours ("Service Providers"). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance, data storage and management, and marketing and promotions. We only provide our Service Providers with the information necessary for them to perform these services on our behalf. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, to protect your Personal Information from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information other than as specified by us.



## **Our Affiliates**

We may share Personal Information with businesses controlling, controlled by, or under common control with Xoopah.

## **Third Parties**

We may share Personal Information with a third party if you specifically authorize it, or it is required to complete a transaction, service, or activity that you initiated or requested.

Note: In such case, the collection and processing of your Personal Information may be subject to the privacy policy of such third party.

## **Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property, or rights of Xoopah or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

# Payments

We use third-party services for payment processing of our users and their customers including Authorize.net and Stripe. Their policy can be viewed by clicking on the link given below.

We store the following information of our users:

1. Card holder name
2. Card Type
3. Card's last four digits,
4. Card expiry month and expiry year.
5. Cardholder address
6. Payment profile ID

For processing the the business' customer's online payments, we only store the transaction ID with us. All the other information is directly collected by the gateway providers.

Stripe: Their Privacy Policy can be viewed

at <https://stripe.com/us/privacy>

Authorize.net: Their Privacy Policy can be viewed

at <https://www.authorize.net/company/privacy/>

# Cookies

A cookie is a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a web site's computers and stored on your computer's hard drive.

We use cookies to record the current session information, but we do not use permanent cookies. You are required to log-in to your Xoopah Site after a certain period has elapsed to protect you against others accidentally accessing your account contents.

We may use your information to remarket our products and services to you. Remarketing is a way for us to connect with you, based upon your past interactions with the Xoopah website ([www.xoopah.com](http://www.xoopah.com)). Any information collected is used only for remarketing and will not be used by us for any other purpose.

We may use third-party data analytics tools to analyze how users use the App and Services including Mixpanel and Google Analytics.

## **Managing Your Information Preferences**

You can opt out of receiving marketing e-mails from us by following the Unsubscribe link provided at the bottom of all marketing e-mails you receive from us. You can opt out of receiving marketing e-mails from us, however, you cannot opt out of receiving all e-mails from us, such as e-mails about the status of your account.

## **Managing Your Personal Information**

If you use an available capability on this Website or through the Services to register with us and create a profile, at any time after

you register and create a profile, you may review and request changes to any personally identifiable information you provided through the registration form, by signing in to view and update your profile within the application and, depending on the site or Service, either self-deleting such information and/or your account or requesting that we delete it.

## **Be Careful When You Share Information with Others**

Please be aware that whenever you share information on any public area of this Website or the Services, that information may be accessed by others. In addition, please remember that when you share information in any other communications with third parties, that information may be passed along or made public by others. This means that anyone with access to such information can potentially use it for any purpose, including sending unsolicited communications.

## **Security**

To prevent the unauthorized access or disclosure of your personal information, Xoopah has put in place all reasonable physical, electronic, and managerial systems required. If you are asked to enter sensitive personal information pertaining to the payment details, Xoopah ensures 128bit SSL encryption in place via our merchant provider. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information

transmitted on or through this Website or the Services, we cannot and do not guarantee the security of any information you transmit on or through this Website or the Services, and you do so at your own risk.

## **Links**

This Website and the Services may contain links to other websites or allow others to send you such links. A link to a third party's website does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third-party websites. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website.

## **Children's Privacy**

This Website and the Services are intended for and directed to a general adult audience. We do not knowingly collect Personal Information from children under the age of 13. If we become aware that we have inadvertently received Personal Information from a child, we will delete such information from our records.

## **Notice to California Residents/Your California Privacy Rights**

If you are a California resident, you may have certain privacy rights under the California Consumer Privacy Act ("CCPA Rights").

This section describes those rights and how you can exercise them with Xoopah.

## **Right to Know**

- You can request what Personal Information we have collected about you in the preceding 12 months.
- You can request the specific pieces of Personal Information we have collected about you.
- You can also request the following categories of information:
  - The categories of Personal Information we have collected about you.
  - The categories of sources from which the Personal Information was collected.
  - The business or commercial purpose for collecting or selling the Personal Information.
  - The categories of third parties with whom we shared Personal Information.

## **Right to Deletion**

You can also request that we delete your Personal Information. We may not delete all your Personal Information if one of the following exceptions applies:

- Transactional: to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or perform a contract we have with you.

- Security: to detect and prevent data security incidents.
- Error Correction: to debug or repair any errors.
- Legal: to protect against fraud or illegal activity or to comply with applicable law or a legal obligation, or exercise rights under the law, such as the right to free speech; or
- Internal Use: to use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information (i.e., to improve our services).

We will also maintain a record of your CCPA Rights requests.

Please note that if we delete your Personal Information, some of our services will not work the same. For example, your previous opt out requests will not be saved and saved preferences and information will no longer be available.

## **Exercising your Rights:**

To exercise your right to know or delete your Personal Information, submit a verifiable consumer request to us at:

Address: 3200 Wilcrest Dr Suite 575, Houston, TX 77042, United States

Phone: [888-207-0567](tel:888-207-0567)

Email: [info@xoops.com](mailto:info@xoops.com)

Your verifiable consumer request must:

- Provide sufficient identifying information (including full name, postal address, and email address) to allow us to reasonably verify you are the person about whom we collected and retained Personal Information, and/or your authority to make such request on behalf of the data subject, and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- Note that we will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request or to review and comply with the request.
- You may authorize someone to act as your agent and submit a request on your behalf. Due to the sensitivity of such requests, you must verify the agent's authorization before we will act. Accordingly:
  - You or your agent must supply written permission for a specific agent to act on your behalf; and
  - We will use your email address to connect directly with you to verify agent identity and authority.
  - We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm with a level of confidence appropriate to the sensitivity of the information that the Personal Information we have collected and retained in our systems and databases relates to you.
- Making a verifiable consumer request does not require you to create an account with us, but if you have an account with us, we may require you to log-in to such



account to verify your identity or authority or to provide or delete your information.

## **Do Not Sell My Personal Information**

### **Personal Information that We Sell**

- We may “sell” (as sell is defined in CCPA) the following categories of Personal Information:
  - Identifiers
  - Characteristics of protected classifications under California and federal law.
  - Internet/electronic activity.
  - Commercial information; and
  - Inferences drawn from the categories described above to create a profile about you to reflect your preferences, characteristics, preferences, behavior, and attitudes.
- We “sell” your Personal Information to digital advertising networks, who in turn may re-sell such Personal Information. We do not knowingly sell the Personal Information of minors under the age of 16.

### **Right to Opt Out of Sale**

California residents have the right to opt out of the sale of your Personal Information to third parties, as “sale” is defined under CCPA.

Currently, we participate in digital advertising networks to deliver advertising that is tailored to your interests. The participation in certain ad networks can constitute a “sale”

of Personal Information under CCPA. To learn more about these advertising practices or to opt out of this type of advertising of your Personal Information, please visit <https://optout.aboutads.info/> and [optout.https://www.networkadvertising.org/](https://www.networkadvertising.org/). You can opt out of the re-sale of your Personal Information by other participants in these digital advertising networks by visiting this site and opting out of each participant's digital property.

Please note that, otherwise, Xoopah does not presently exchange Personal Information for money with anyone, nor does Xoopah otherwise share Personal Information within the meaning of "sale." Also, Xoopah does not currently disclose Personal Information to third parties for their direct marketing purposes.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by emailing us at [info@xoops.com](mailto:info@xoops.com) with the subject: "DO NOT SELL MY PERSONAL INFORMATION"

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize Personal Information sales. However, you may change your mind and opt back into Personal Information sales at any time.

## **Non-Discrimination; Financial Incentives**

We will not discriminate against you for exercising any of your CCPA Rights and we will not deny you goods or services, charge

you a different price, or provide you with a lesser quality of goods or services if you exercise any of your CCPA Rights.

However, we may offer various financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

## **Privacy Policy Changes**

Xoopah reserves the right to change this privacy policy at any time. By continuing to use this Website or the Services, you are consenting to the revised Privacy Policy.

## **Contact Us**

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

Address: 3200 Wilcrest Dr Suite 575, Houston, TX 77042, United States.

Phone: [888-207-0567](tel:888-207-0567)

Email: [info@xoops.com](mailto:info@xoops.com)

Please print a copy of this privacy policy for your records and PLEASE check this Website frequently for any changes.

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