

Privacy Policy

Last updated: Wednesday, September 19, 2018

Please direct all questions, inquiries, concerns or communications regarding this Privacy Policy (hereinafter referred to as “**this Policy**” or “**the Policy**”) to:

Promise Xu

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Klido™ Inc. and its subsidiaries (collectively, “**Klido™ Group**”, “**us**”, “**our**” or “**we**”) provides: 1) the website and web app located at klido.me, kli.do, klidochat.com, and other domains owned and provided by us (the “**Sites**”); and 2) any product or service provided by us, including our mobile app, Klido™, (the “**Products**”), and this Policy described how we collect, use and share your information whenever you use our Sites or Products.

You must be **at least 13 years old** to use our Sites and Products. If you are under the age of majority in the jurisdiction you reside, please have you parent or guardian review this Policy on your behalf.

This Policy maybe amended by us from time to time. If we make any material amendment, we may notify you by: 1) displaying a notice on our Sites; 2) communicating to you via the email you provided to us on your Klido Account; and/or 3) displaying a notice in our Products.

Information We Collect

Information Collected Automatically

When you use our Sites and Products, we collect the following information automatically:

- **Device Information:** We collect information about your device whenever you access and use our Sites and Products, including the hardware model, operating system and version, unique device identifiers, browser type and language, and localization and language settings.
- **Usage Information:** We collect information about some of your basic interactions with our Sites and Products automatically, including the time, date and frequency of you accessing and using our Sites and Products, the length of your usage of our Sites and Products, the types of actions and pages you take and visited, and usage information that related to a malfunction, crash or bug within our Sites and Products.

- **Information Collected by Cookies and Other Tracking Technologies:** Similar to other websites and online services, we use cookies, web beacons and other technologies. Most web browsers are set to accept cookies by default.
- **Website Log Information:** We collect log file information when you use our Sites. This information includes but is not limited to, your web browser type, language, access times, pages viewed, your IP address, the website that guide/link you to our Sites, the sequence of pages viewed and other viewing behaviours.

Information You Provide Us

When you use the specific functions of our Sites and Products, we collect specific information related to the specific functions accessed.

- **Creating and Using Account:** When creating account in our Products, you provide us with your display name and at least one of: your phone number, authorization to authenticate with your Facebook account and associated information, or authorization to authenticate with your WeChat account and associated information. You may also provide us with your email address, your avatar, and languages you know. You can change or update this information in our Products. When logging into your account, you need to provide us with your email address, your phone number or your username, together with your password. You may also log into your account by re-authenticating with your Facebook account or your WeChat account, or providing your phone number and a verification code sent to that number.
- **Creating a Post:** When creating a post using your account, you provide us with the content of your post (which may include text, links, images, polls and its associated content, and videos), the time and date of when you create the post, any restriction you specify on who can view, which Circles you want the post to be in, and the list of users you want to specifically invite to view the post. The post is then created in association to your account.
- **Creating a Poll:** When you create a poll (as part of the process of creating a post), you provide us with the title of your poll, the text of each poll option (against which a user can cast a vote), and settings related to the post (such as whether multiple selection is allowed, whether the poll is anonymous). The poll is then created in association to your post.
- **Managing a Post Chat Room:** When a post is created, a chat room is also created in association with the post. You provide us with settings information related to a post chat, which could be different depending on whether you are the creator of the post or not. You can update your information regarding a post chat any time.
- **Participating in a Poll:** When you participate in a poll, you provide us with your vote(s).
- **Joining and Leaving a Post Chat Room:** When you join or leave a post chat room, such actions are recorded on the associated post.

- **Sending a Message:** When you send a message in Klido™, you provide us with the content of your message (which may include text, image, video, link to a user's profile, link to another post, link to a Circle and link to a website), the date and time of when you send the message and the recipient(s) of the message. The message is then created in association to your account and to the specific recipient(s).
- **Adding or Deleting a Friend:** When you add (more specifically, request to add) or delete a friend, you provide us with the user you wish to add or delete as friend, an optional message attached with your add friend request (in the case of adding friend), and how you discover the user you request to add as friend (in the case of adding friend), .
- **Confirm, Mark as Read or Delete a Friend Request:** When you confirm, mark as read or delete a friend request sent by another user, you provide us with the information regarding your choice.
- **Creating or Managing a Circle:** When you create or manage a Circle, you provide us with the information regarding the Circle, including the time and date of when you create or modify the Circle, the Circle name, the Circle description, the Circle avatar, list of users and admins and other related settings regarding the Circle.
- **Joining or Leaving a Circle:** When you join (more specifically, request to join) or leave a Circle, you provide us with the information regarding your joining or leaving, together with an optional message associated with your request (in the case of requesting to join). You also provide us with your choice regarding whether you wish to display this Circle on your profile.
- **Phonebook and Contact Information:** With your consent, you provide us with your phonebook and contact information when you use functions that require such information, including find friends by email/phone number.
- **Other Information:** Throughout your usage of our Products and Services, you may provide us with other information.

Information We Collect from Other Sources

We may also collect information from other sources, including your social media accounts (with your consent and authorization).

Information We Collect When You Contact Us

When you contact us (for example, with questions, concerns or support requests), we collect whatever information you provide to us and your contact information.

How We Use Information

We use the information we collected from you, other users and other sources for the following purposes:

- Provide and deliver the functionalities and services in our Sites and Products to you and other users;
- Communicate with you for various reasons, such as responding to your questions or inquiries, informing you of available products and services from us or other parties and informing you of updates and upgrades available;
- Monitor, analyze and predict trends related to our Sites and Products;
- Develop, improve and update our Sites and Products;
- Bring to you personalized information based on information we have collected about you;
- Verify your identity and prevent unauthorized use of your account;
- Prevent, investigate and stop illegal, unauthorized or detrimental usage of our Sites and Products, including those in violation of our Terms of Services; and
- Other purposes for which the information is collected for.

What you may be more interested in is, **how we are NOT going to use information collected from you:**

- We don't view or read the content of any message you send, in any way that could allow access to the specific content of your message to a person (a human being) that you haven't explicitly or implicitly allow access to, unless: 1) with the consent of you or any one of the receivers of the message; 2) in response to a flag/complaint created by a user who has authorized access to the message, indicating the message is inappropriate, abusive, illegal or otherwise not in compliance with our Terms of Services; 3) in response to an emergency, immediate safety concern or any other immediate serious threat to any person or property and the content of your message is deemed to be potentially helpful in resolving, investigating or preventing those situation; 4) our system detect your message to be potentially inappropriate, abusive, illegal or otherwise not in compliance with our Terms of Services; or 5) as requested or required by appropriate authorities and applicable laws and regulations. In any situation, we will refrain from allowing you, the sender, to be personally identified with the message, unless necessary. We will also strive to inform you before, during and after such access, and communicate to you the reasons for access, any action taken and the result of such access, if appropriate. We will limit the scope and scale of access to the content of your message whenever possible.
- The above also apply similarly to any other information you create and/or share with us.
- We don't knowingly collect and process any information from someone under the age of 13.

Where Information Is Processed

Similar to many other websites and services, your information may be transferred and processed in Canada, United States and any other countries in the world. We strive to maintain the integrity, security and safety of your information during such process and

transition, regardless of where they might happen, in pursuant with local, national and international laws and regulations.

How We Share Information

Sharing Among Klido Users

As a natural part of our Products, information we collected from you are shared with other users, depending on the specific situation:

- **Account Information:** Information we collected as part of your Klido account is shared with other users and you can control the amount of information you share, depending on your relationship with them.
- **Post Information:** Information we collected during the post creation process is shared with all users who you specify should have access. You can also specify the amount of post information you wish to share with users who are not (yet) your friends. Please remember that Klido retains all posts created by you and others, therefore anyone with access to your posts can view historical posts, even those you created before they are allowed to access your posts (unless of course, you specifically limit access to a subset of users only).
- **Poll Information:** Information we collected during the poll creation process is shared with all users who you specify should have access to the associated post. If you specify the poll to be shareable, your poll can then be shared by users who have access to it and consequently other users can gain access to the information you provide. When a poll is shared, the originally associated post is not shared, however.
- **Chat Room Information:** When you join or leave a chat, your joining or leaving is shared with other users in or viewing the chat room. Information we collected as part of your chat message is shared with other users in or viewing the chat room. Please remember that Klido retains all chat messages sent by you and others in a chat room, therefore anyone with access to a chat room can retrieve historical chat messages, even those sent before they join a chat room.
- **Post Settings Information:** As the creator of a post, you can close the associated chat temporarily to prevent any new user to join the associated chat room. Information regarding whether the chat room is closed or not, is naturally, shared with users who have access to view the post.
- **Poll Vote Information:** When you participate in a poll by voting, we increment the number of votes accordingly. For non-anonymous poll, only your friends can see your specific vote and the fact that you voted, for poll associated with post not in any Circle. For poll associated with post in Circles, all users with access to the post can view your specific vote and the fact that you voted.
- **Friend Information:** The number of friends you have in common with another user is shared with that user.
- **Circle Information:** When you join or leave a Circle, your joining or leaving is shared with other users in the Circle.

- We may share information with other users as per your consent, or as specified in our Sites and Products, or as otherwise specified in this Policy.

Share with Third-Parties

There are situations that we need to share information collected from you with third-parties:

- We may share information about you and collected from you with our service providers who perform services on our behalf.
- We may share information about you in response to legal process or a request for information if we believe disclosure is consistent with, or required by, any applicable law, rule, or regulation; to investigate or remedy potential violations of our Terms of Services or other policies, or to protect the rights, property, and safety of us, our users, or others; or in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- We may share information with third-parties as per your consent, or as specified in our Sites and Products, or as otherwise specified in this Policy.
- Aggregated or de-identified information, which cannot reasonably be used to personally identify you, may be shared with third-parties.

Deletion of Information

Upon your request, we will work with you to delete information provided by you. Please keep in mind that we may retain certain information in backup for a limited period of time or as required by law. Aggregated or de-identified information originated from your information may not be deleted. A few quick notes about deletion of information:

- We cannot guarantee the deletion of information from our server within a specific timeframe. Further, we cannot guarantee the deletion of information from the devices of other users who previously have access to your information. Finally, as with all electronic data, even deleted information may be retrieved forensically.
- Similar to email or regular mail, messages already sent out by you cannot be deleted by your request – the recipients of your messages can access them.

Analytics Services Provided by Others

We may let other companies use cookies, web beacons and other technologies on our Sites and Products to collect information about how you use our Sites and Products and other websites and services. The information collected may include unique device identifier, device information, operating system information, IP address, browser information, session time, pages visited and time, geographical location, and many others. This information may be used to, among other purposes, monitor, analyze and predict trends related to our Sites and Products; develop, improve and update our Sites

and Products; and bring to you personalized information based on information we have collected about you. As there is currently no industry standard in regards to the Do-Not-Track signal sent by some browsers, we currently do not respond to such signals.

Currently, we utilize the following services. You may wish to review their Privacy Policies and other terms regarding you.

- Fabric (<https://www.fabric.io/>)
- Flurry Analytics (<http://www.flurry.com/>)
- Google Analytics (<http://www.google.com/analytics/>)
- GoSquared (<https://www.gosquared.com/>)
- MixPanel (<https://mixpanel.com>)
- NudgeSpot (<http://www.nudgespot.com/>)
- Segment (<https://segment.com/>)