

YOU-app by Fifth Corner Inc. Privacy Policy

Last update: May 2018

Highlights of this Privacy Policy

Welcome to YOU-app by Fifth Corner Inc. Ltd. We make self-improvement simple. Give us just one minute of your day, and we'll help you take small steps, 'micro-actions', towards a happier, healthier life.

Fifth Corner Inc. ("Fifth Corner Inc.", "the Company", "we", "us", "our") provides online and mobile services which may collect and process personal data of users. This Privacy Policy applies to personal data we obtain from individuals ("User(s)") through our mobile applications, websites, online services, and web-based applications (collectively, the "Service(s)").

We know that your data and privacy is important to you. It is of utmost importance to us that we treat it with the respect and care it deserves. Below is a brief summary of our privacy policy:

- The vast majority of our user data is received directly from users, for example uploaded as action posts to the Service. By using our Service you understand and agree that we are providing a platform for you to post content, including but not limited to, photos, comments and other materials ("User Content") and share that User Content in accordance with your privacy settings (you can change these privacy settings in your profile and each time you post an Action Instance). This means that other Users may search, see, or share the User Content that you make publicly available through the Service, consistent with the terms and conditions of this Privacy Policy and our Terms of Use. Exercise care when sharing personal data when you use the Service, especially when using the social media functionalities of the Service.
- Data concerning health and wellness, which may form a part of the personal data collected by us, constitutes sensitive personal data. By using the Service you give your consent to the processing of sensitive personal data in accordance with the privacy practices described in this Privacy Policy. You have broad rights to correct, access, delete, restrict, and object to the use of such data.
- The vast majority of personal data we hold is uploaded by you to the Service. We encourage you to visit your profile in the Service and there edit, delete, correct or limit the visibility of your content and data.
- The Service may include functionalities that enable us to access certain information directly from third-party services, devices and/or products. By choosing to integrate with the Service any services and accounts, devices and/or products provided by third parties, you give us your consent to receive, collect and process any data that we receive from such third party services. Please be aware that we are not responsible for the privacy practices of any third parties.
- Submitting personal data about other individuals, such as pictures or contact information, may violate the privacy of these individuals, so use care.
- We may disclose your personal data to:
 - Other users of the Service in accordance with the privacy settings you've specified yourself;
 - To our service providers to improve the Service;
 - To potential advertising partners, only if compliant with your consent, privacy settings and applicable laws;
 - To public authorities if required by the law; and
 - To our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Service in connection with a corporate reorganization.

1. Introduction

We know that you are concerned about how we use and disclose personal data, especially data regarding your health and wellbeing. Our Privacy Policy explains what data we process, how we do that and how the data subjects, i.e. Users, may use their rights (e.g. right to object, right of access). Note that:

- Some of our services might be subject to a separate privacy policy. If a separate privacy policy applies to a particular service, we will post it in connection with the service in question.
- This Privacy Policy only covers data processing carried out by Company. The Privacy Policy does not address, and we are not responsible for, the privacy practices of any third parties. The Company disclaims all responsibility for the processing carried out by third parties, also in cases where Services include hyperlinks to third parties' websites.

This Privacy Policy constitutes a description of the data file as set out in the Finnish Personal Data Act (Sections 10 and 24).

Fifth Corner Inc. Ltd. is committed to protecting and respecting your privacy. Privacy, security and online safety are important for us, and we process all personal data with due care and in accordance with applicable laws and regulations.

This Privacy Policy (together with our terms of use available on you-app.com and any other documents referred to in it) sets out the basis for how personal data that you provide to us or we collect from you will be handled. In this Privacy Policy, the term "personal data" means information that relates to an identified or identifiable natural person. "Sensitive personal data" means personal data concerning e.g. health, wellbeing or personal life. We process sensitive personal data only to the extent necessary or appropriate for providing the Service to you. By accepting this Privacy Policy you give your consent to the processing of sensitive personal data in accordance with the privacy practices described herein.

CONTACT INFORMATION:

Name: Fifth Corner Inc. Ltd
Company ID: 2648974-8
E-mail address: support@you-app.com
you-app.com

2. Personal Data Processed and Information We May Collect

In this Section we describe the personal data we collect. We collect two types of information from the Users: (i) User Data; and (ii) Technical Data.

(i) User Data: Data You Provide to the Service and Data that We Get from our Partners Based on Your Consent

We may collect the following information that in certain circumstances, alone or in connection with other data, constitutes personal data. **The data listed below is either provided directly by you, or we may obtain it from our partners if you decide to integrate the services**, devices and/or products provided by the partners with the Service. Thus, not all information listed below may be applicable to you.

- Name, e-mail address, birthday, gender, bio;
- User ID and password;
- Picture of the User;
- Date when you joined the Service, and the date on which you previously used the Service;

FINAL

- Data regarding the Action Instances you have engaged in within the Service, such as Action Instances you have completed and/or created, your likes and comments, and the time and date you last engaged with an Action Instance;
- All photos and text that you upload to the Service;
- Data related to the social features of the Service, e.g. the users you follow and who follow you; information on any friend requests, and comments and other user-generated content you create;
- Data about your location that you may have provided in the Service, e.g. in your profile or bio;
- Data related to your use of the Service, such as password reset requests;
- Data on your account preferences, such as preferences related to push notifications, email alerts and your default privacy settings.
- We may add more health and wellness related information, such as (if and when you either input this data yourself, or integrate a third party service which provides this data):
 - Data about your physical attributes, such as your height;
 - Data about your physical activity level, such as activity type, time, distance or step count;
 - Data about your wellbeing such as stress, mood or any feelings or “vibes” you may record;
 - Data related to your rest and sleep patterns, such as time of your sleep, or alertness level.

Where applicable, if the data has not been provided to us directly by you, we also collect the source where we have obtained the data, such as the personal fitness or body-monitoring electronic product of a third party partner integrated by you. Further, if you give your consent to integrate the Service into a partner service, we may collect personal data, such as your user ID, name, or e-mail address, available in your public profile with the partner service.

By uploading data to the Service you warrant that you own the Content that is posted by you or that you have the right to post the Content on the Service and the right to grant the rights and licenses described in our Terms and Conditions. You also warrant that the Content you post on the Service does not violate, misappropriate or infringe on the rights of any third party.

We do not claim ownership of any Content that you post on or through the Service. Instead, you hereby grant to Fifth Corner Inc. a non-exclusive, fully paid and royalty-free, transferable, sub-licensable, worldwide license to use the Content that you post on or through the Service in order to operate the Service for you, always respecting your privacy settings in the Service.

If you use a third party service, such as Facebook Connect, for signing into the Service, we may collect the personal data needed to sign you in, such as your user ID, name, or e-mail address. These are available in accordance with the terms of service and the privacy settings of the third party service you use, and you may control this personal data by adjusting the privacy settings in the third party service.

Moreover, if you contact us, a record of this correspondence may be kept.

(ii) Technical Data

The Service automatically collects Technical Data from Users. **This data is primarily used to improve the Service and on an aggregate level** (i.e. so that individual users cannot be identified). Technical Data may, in certain circumstances, alone or in connection with other data, constitute personal data and will in such situations also be treated as such.

- **Usage data:** We collect usage data in our own database as well as use third party services including Google Analytics and other web analytics services to compile Technical Data and reports on usage to help us improve our Services. For an overview of Google Analytics, please visit Google Analytics. You can opt-out of Google Analytics with a Google Analytics opt-out browser add-on tool. We and third party services use, collect and store data on your use of the Service, including information on

how long the Service is used, which screens are opened and for how long, which buttons the user taps, information on the device used to access the Service, location in which the Service is used, and any crashes, exceptions or similar occurrences.

- **Tokens:** We also collect information on push notification service tokens to identify which user is linked to which third-party device identifier, information on user API tokens to identify the authentication credentials for the Service, information on user SOURCE tokens to identify the authentication credentials for third-party services, and information gathered by server log files.
- **Cookies and similar technologies:** When you visit the Service, we may use cookies and similar technologies to collect information about how you use the Service. Cookies allow us to calculate the number of people visiting our Services and monitor their use. This helps us improve our Services and better serve our Users. We may also use cookies to make the use of the Services easier, for example by remembering usernames, passwords and preferences. We may use tracking and analytics cookies to see how well our Services are being received by our Users. Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. This can usually be done through the Internet browser's settings. Please note that some parts of our Services may not function properly if use of cookies is refused
- **Log file information:** Log file information is automatically reported by your browser each time you make a request to access (i.e., visit) a web page or app. It can also be provided when the content of the webpage or app is downloaded. When you use our Service, our servers automatically record certain log file information, including your web request, IP address, browser type, referring URLs, clicks, and other such information. We may also collect similar information from emails sent to our users which help us track which emails are opened and which links are clicked. The information allows for more accurate reporting and improvement of the Service.
- **Device identifiers:** When you use a mobile device like a tablet or phone to access our Service, we may access, collect, monitor, or store one or more "device identifiers." Device identifiers are small data files which uniquely identify your mobile device. A device identifier may deliver information to us or to a third party partner about how you use the Service and may help us or others provide reports or personalized content. Some features of the Service may not function properly if use or availability of device identifiers is impaired or disabled.
- **Metadata:** Metadata is usually technical data associated with User Content. For example, Metadata can describe how, when and by whom a piece of User Content was collected. Users can add Metadata to their content e.g. in the form of a hashtag or a comment. This makes content more searchable by you and/or others.

Moreover, details of transactions you carry out through the Service, details of your visits to the Service including, but not limited to, traffic data and other communication data may also be collected.

3. Purposes for Grounds for Using The Data

We use the collected personal data for the following purposes:

1 | To provide our Services and carry out our contractual obligations

We process personal data in the first place to be able to offer the Services to Users and to run, maintain and develop our business. In some cases, personal data may be processed in order to carry out our contractual obligations towards the User. For example:

- To set up and maintain your registration with the Service;
- To communicate with you when you contact our customer service;
- To operate, develop, improve and protect the Service;
- To personalize the Service;
- To provide features available in the Service;

- To protect your and our rights and/or your and our property;
- To manage the Service;
- To process any transactions you may enter into in the Service;

2 | For customer communication

We may process personal data for the purpose of contacting Users regarding our Services and to inform Users of changes. Data may also be used for research and analysis purposes to improve our Services.

3 | For quality improvement and trend analysis

We may process information to improve the quality of our Services e.g. by analysing any trends in the use of our Services. When possible, we will do this using only aggregated, non-personally identifiable data.

- To ensure the technical functionality and security of the Service;
- To monitor metrics such as number of users, traffic and demographic patterns;
- To prevent and investigate fraud and other misuses;
- To audit and analyze the Service; and
- To develop, improve, and protect the Service;
- For market research and marketing in accordance with applicable laws and your account preferences

Legitimate grounds for processing

We process personal data to perform our contractual obligations towards Users and to comply with legal obligations. Furthermore, we process personal data to pursue our legitimate interest to run, maintain and develop our business. In some parts of the Services, Users may be requested to grant their consent for the processing of personal data. In this event, Users may withdraw their consent at any time.

4. Transfer to countries outside Europe

We only transfer personal data collected and processed in connection with the Services to countries outside the European Economic Area in very few cases. We have operations, entities, and service providers in several geographical locations. At the time of writing, at least two of them, Google Analytics and our emailing program SendGrid are located in the US. Both of these providers are GDPR compliant. As such, we and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile. We will take steps to ensure that Users' personal data receives an adequate level of protection in the jurisdictions in which we process it. We provide adequate protection for the transfer of personal data to countries outside of the European Economic Area through a series of intercompany agreements and agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

More information regarding the transfers of personal data may be obtained by contacting us on addresses mentioned in this Privacy Policy.

5. Social Functionalities of the Service

Please be aware that if you utilize the social functionalities of the Service, other users of the Service will be able to see personal data you have submitted to the Service, including for instance your name and photo. Moreover, the users that follow you in the Service may see personal information such as the Action Instances you are completing or have completed. Therefore, **please be careful when sharing personal data in particular with other users of the Service.**

We never post on your behalf. If you choose to invite someone to the Service through our "Invite friends" feature, you may select a person directly from the contacts list and send an email from your personal account. You understand and agree that you are responsible for any charges that apply to communications sent from your device, and because this invitation is coming directly from your personal account, we do not have access to or control this communication.

6. Recipients and How We Disclose Data

We only share personal data within the Company if reasonably necessary to perform and develop our Services. **We do not share personal data with third parties outside of the Company** unless one of the following circumstances applies:

It is necessary for the purposes set out in this Privacy Policy

To the extent that third parties need access to personal data to perform the Services, the Company has taken appropriate contractual and organizational measures to ensure that personal data is processed exclusively for the purposes specified in this Privacy Policy and in accordance with applicable laws and regulations.

For legal reasons

We may share personal data with third parties outside the Company if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of the Company, our Users or the public in accordance with the law. When possible, we will inform Users about such transfer and processing.

To authorized service providers

We may share personal data to authorized service providers who perform services for us (including data storage, sales, or customer support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy. Please bear in mind that if you provide personal data directly to a third party, such as through a link on our website, the processing is typically based on their policies and standards.

For other legitimate reasons

If the Company is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all Users concerned when the personal data are transferred or become subject to a different privacy policy as soon as reasonably possible.

With explicit consent

We may share personal data with third parties outside the Company for other reasons than the ones mentioned, only when we have the User's explicit consent to do so. The User has the right to decline or withdraw this consent at all times.

Please note, that the personal data you yourself upload to the Service follows your privacy settings and can thus be available to other Users of the Service if you so specify. We urge you to be very careful when deciding to disclose your personal data, or any other information, on the Service.

Moreover, we may disclose information to third parties in an aggregate format, meaning it does not constitute personal data and does not allow the identification of individual users.

7. Your Rights

You have the following rights with respect to the personal data we hold about you:

Right to access

The Company offers access for the Users to the personal data processed by the Company. The vast majority of the personal data we have is provided by the User directly, and is thus directly available in the User's

profile in the Service. For additional data, Users may contact us and we will inform what personal data we have collected and processed regarding the said User and the purposes such data are used for.

Right to withdraw consent

In case the processing is based on a consent granted by User, User may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use our Services. The fastest way to withdraw consent is by exercising the right to deletion (see below): either by deleting personal data (such as Action Instances) or one's account in the Service.

Right to correct

Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed. Most personal data can be found in the Service's profile and can be corrected directly by the user there.

Right to deletion

Users may also use us to delete the User's personal data from our systems. This is most easily done within the Service's profile, where e.g. personal data, Action Instances or the profile can be directly deleted. We will comply with such request unless we have a legitimate ground to not delete the data. We may not immediately be able to delete all residual copies from our servers and backup systems after the active data have been deleted. Such copies shall be deleted as soon as reasonably possible.

Right to object or to restrict processing of data

Users may object to certain use of personal data if such data are processed for other purposes than purposes necessary for the performance of our Services or for compliance with a legal obligation. Users may also object any further processing of personal data after prior given consent or request to restrict certain processing of personal data. This may however lead to fewer possibilities to use our Services. The fastest way to object is by exercising the right to deletion (see above).

Notwithstanding any consent granted for the purposes of marketing, the User has the right to prohibit us from using personal data for direct marketing purposes, market research or profiling. All electronic direct marketing communications that you may receive from us, such as e-mail messages, push notifications and SMS-messages, give you an option of not receiving such communications from us in the future.

Right to data portability

Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

How to use the rights

The above mentioned rights may be used by sending a letter or an e-mail (support@you-app.com) to us, including the following information: name, user name and email address connected to your account. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

8. Lodging a Complaint

In case User considers our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.

9. Storage Period

The Company does not store personal data longer than is legally permitted and necessary for the purposes of providing the Services or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use.

Typically, we will store User's personal data for as long as the User is a registered subscriber or user of our Services and, thereafter, for no longer than is permitted by law or reasonably necessary for internal reporting and reconciliation purposes.

In general, personal data of Users are deleted within reasonable time after the User requests to delete personal data.

10. Data Security

The security of your personal data is very important to us. **We will take all reasonable and appropriate security measures to protect the personal data we store and process from unauthorized access or unauthorized alteration, disclosure or destruction.** Measures include for example, where appropriate, encryption, firewalls, secure facilities and access right systems.

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our websites, data centers, systems, and other assets for security vulnerabilities.

Should despite these security measures, a security breach occur that is likely to have negative effects on the privacy of Users, we will inform the relevant Users, other affected parties, and relevant authorities when required by applicable data protection laws, about the breach as soon as reasonably possible.

11. Children's Privacy

Our Services are created primarily for adults. YOU-app does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register for the Service. The Service and its content are not directed at children under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 without parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us either via e-mail at support@you-app.com.

12. Changes to the Privacy Policy

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our website you-app.com. We will not make substantial changes to this Privacy Policy or reduce the rights of Users under this Privacy Policy without providing a notice thereof.

13. Questions or Concerns?

Should you have any questions regarding this Privacy Policy, your privacy as it relates to the use of the Service, or the protection of the personal data we hold about you, please contact us via e-mail at support@you-app.com, or by mail at the address for Fifth Corner Inc. Ltd, available on you-app.com. **We seek to swiftly resolve any concerns you may have.**

Please note that e-mail communications are not always secure; so please do not include health related data, credit card information, passwords or other sensitive information in your e-mail messages to us.