

# **Stumbl Privacy Policy**

Welcome to the Stumbl Privacy Policy. This explains how we collect, store, protect, and share your information, and with whom we share it. We suggest you read this in conjunction with our Terms & Conditions

## **Who we are:**

The App and Site are operated by the “Stumbl” (also referred to in this policy as “we” or “us”) of which we are controllers of personal information collected and processed through the Stumbl App and Sites. Stumbl has a designated Team and they can be reached by emailing: **hello@stumbl.com** or by post at the following address: **2/A, Grant Lane Shree Krishna Square, Room Number 1F, Kolkata: 700012, West Bengal.**

## **1. COLLECTION OF INFORMATION.**

### **Registration Information**

When you download the App and create an account (“Account”), we may collect certain information (“Registration Information”) about you, such as:

- Name;
- Username;
- Email address;
- Mobile number;
- Gender identity;
- Date of birth;
- Photographs;
- Location; and
- Login information for social media accounts that you connect to your Stumbl Account (this could include, for example, your Facebook and Instagram accounts). For more information about this, see “Linking other Accounts to Stumbl” in section 7 below.

You will also be required to create a password in connection with the registration of your Account. Once you register, you will be able to review and change this information at any time just by logging in to Stumbl (other than your date of birth and location (which, if you have given Stumbl access to your location in your device settings, is automatically updated based on the location of your device)). It is your responsibility to ensure that your account details are kept up to date. If your phone number changes, please ensure that you update this in your account.

The information we collect helps to enhance the App and verify our Users. Registration Information such as your name and username may be visible to other Users who view your profile page.

This must also be brought to your attention that the e-mail address and registered phone number is only for internal use. We at Stumbl take your privacy with utmost priority and only display the necessary.

The user's Stumblly profile will only display the date of birth and month. We do not display your birth of year.

Other details such as location, event, photographs and your preferences are displayed according to the level of privacy that the user wants to keep the settings of the app. They are completely at the user's discretion.

## **Profile Information**

We recommend and encourage you (and all our members) to think carefully about the information you disclose about yourself. We also do not recommend that you put email addresses, URLs, instant messaging details, phone numbers, addresses, credit card details, Aadhaar Card Number, drivers' licence details and other sensitive information which is open to abuse and misuse on your profile.

When you post information about yourself or use the messaging function to communicate with other Users, the amount of personal information you share is at your own risk. Please see Section 4 below for more information on who can access what you post on Stumblly.

## **Profile Verification Information**

For safety and security and to ensure you have the best possible user experience, we require Users to verify their accounts and might ask for your phone number and, in some instances, we might also ask that you carry out photo verification. We want to make sure you are not a robot. And we also want to avoid fake Stumblly accounts being created which can be used for malicious activities and cybercrime – they threaten the Stumblly network and spoil things for everyone. This verification might be required by us for the prevention of fraud. You can also verify your photo on a voluntary basis (to add the 'verified' badge to your profile).

## **Purchases Information**

If you decide to purchase any of our premium services, we will process your payment information and retain this securely for the prevention of fraud and for audit/tax purposes.

Stumblly uses automated decisions to prevent fraudulent payment transactions being processed as part of its anti-fraud procedures. In order to do this, our systems check payment transactions for behaviour that indicates breaches of our Terms and Conditions of Use. If a transaction meets certain criteria that demonstrate that the Terms and Conditions of Use are likely to have been breached and the transaction is likely to be fraudulent, the relevant transaction may automatically be blocked. Where a transaction is blocked, the user will be notified that their transaction cannot be processed and affected Users can contact Stumblly to contest the decision.

## **Geolocation Information**

If you have given Stumblly access to your location in your device settings, when you use your mobile, we will collect information about WiFi access points as well as other location information about your longitude and latitude and may save your device's coordinates to offer certain features to you. This information helps us identify your physical location and we use it to personalise the App and make it easier

for you to interact with other Users, by enabling the general locality information to be displayed to Users seeing your profile and showing you the profiles of other Users who are near you.

If you have given Stumblly access to your location, but wish to turn this off, you can do so by the following methods:

1. iPhone app — settings, privacy, location services, Stumblly
2. Android — settings, location, Stumblly, permissions, location

The precise location data is information about the geographic position of the devices that is defined by the latitude and longitude coordinates and time stamp the GPS signal generates from the respective user's device. Stumblly then combines this data with other information that we or other user creates. Such data conclusively helps us to create a platform where we show geo tagged media, venues, events created by other users and other points of interest.

Every user must have their location services enabled in order to have access to the Stumblly app. It is imperative to note that every media that is uploaded on the app will be geographically tagged and the user must be aware about this fact.

Stumblly allows their users to have three different privacy settings with regard to their location settings.

1. Visible to all: This setting allows the user to display its real time location to every user on the app.
2. Hidden: This setting allows the user to only share its location with Stumblly.
3. Visible to other known users: This setting allows the user to share its location with another accepted user.

As per your given selection, Stumblly will then share your current location. We at Stumblly assure you that we will not be sharing your location with other third parties. Also, we will only use this information for the sole purpose of providing you with the services of the app. You may at any time no longer allow our Services to use your location by turning this feature off at the Mobile Device setting.

## **Device Information**

We may collect information about your device when you use the App including the unique device identifier, device model, operating system, and MAC address, for a number of purposes, as set out in this policy. In addition, if you permit us to do so, the App may access your device's address book solely in order to add someone to your contacts.

## **Links**

We may keep track of how you interact with links available on Stumblly including third party services by redirecting clicks or through other means. We may share aggregate click statistics such as how many times a particular link was clicked on.

## **When you Contact Customer Support**

If you contact our Customer Support team, we will receive your email address, and may track your IP address, as well as the information you send to us to help resolve your query. We will keep records of our communications with you, including any complaints that we receive from you about other Users (and from other Users about you) for 3 months after deletion of your account.

## Cookies and similar technologies

When you visit our Sites or when you use our App, we may collect personal data from you automatically by using cookies or similar technologies. A cookie is a small file that can be placed on your device or browser that allows us to recognise and remember you.

## 2. USE OF YOUR INFORMATION.

Our main goal is to ensure your experience on Stumbl is pleasant. In order to deliver an enjoyable experience to you, we may use your Registration and other information to:

- offer you our services and features;
- contact you with information about the App (e.g., updates and new features);
- personalise the App/Site and the content we deliver to you;
- conduct research and analytics about how you use and interact with the App/Site;
- resolve disputes, troubleshoot problems and to enforce our Terms & Conditions;
- investigate fraud, protect our legal rights, and to enforce our Terms & Conditions.
- to send you information about the promotions and offers we have available - if you've signed up for our newsletters or otherwise.
- protect our Users and third parties from harm.

## Moderation Practices

We use a combination of automated systems and a team of moderators to monitor and review accounts (including photos and any other information uploaded onto user profiles) and messages for content that indicates breaches of our Terms and Conditions of Use. If an account or message meets certain criteria that demonstrate that the Terms and Conditions of Use are likely to have been breached, the relevant account will be subject to a warning and the user's access restricted and/or blocked. Affected Users can contact Stumbl to contest the decision.

**If you post anything that is inconsistent with our Terms and Conditions of Use, we reserve the right to terminate or restrict access to your Account.**

## Lawful Basis

Under data protection laws, we are required to tell you our lawful basis for using your data and we have set this out in the table below. Where the legal basis is consent, you can withdraw consent at any time. Where the legal basis is legitimate interests, you have a right to object to our use of your data. We explain in the relevant sections in this Policy how you can withdraw consent or opt-out of certain data uses (where applicable).

Purpose for which data is used	Data	Source	Legal basis
To provide you with the Stumbl social networking service	Name, email address, date of birth, location	You provide your name, email address and date of birth to us. We obtain location data from the device that you use to access the service	Contractual necessity
To facilitate networking opportunities on the Stumbl App	Optional information that you choose to provide in your profile, including through profile verification, or adding Stumbl badges, which may include information about your religion, ethnic background, photos etc.	You provide this information to us	Consent
To verify your identity and prevent fraud and to ensure the safety and security of Users	Phone number and if requested, photo provided as part of profile verification	You provide this information to us	Legitimate interests – it is in our legitimate interests to ensure that accounts are not set up fraudulently and to safeguard Users of the site
To take payment for premium services	Payment card details	You provide this information to us	Contractual necessity

To send you marketing information about our offers and services	Email address and mobile phone number	You provide this information to us	Consent
To show you other Users and geo tagged media content near your location	WiFi access points and location data when you use the App (if you give us permission). Other User's content will be visible to you depending upon their privacy settings.	We obtain this information from the device that you use to access the service (if you give us permission)	Legitimate interests – it is in our legitimate interests to provide this functionality as part of the services
To carry out research and analysis to help us improve the App	Log and usage data, including IP address, browser type, referring domain, pages accessed, mobile carrier and search terms, images and video	You provide photos and videos to us. We obtain the log and usage information from the device that you use to access the service	Legitimate interests – it is in our interests to analyse the way in which Users are accessing and using our services so that we can further develop the App, implement security measures and improve the service
To respond to correspondence and queries that you submit to us, including social media queries	Email address and IP address, social media name, phone number	You provide your email address, social media name and phone number to us when you contact us and we obtain your IP address from the	Legitimate interests – it is in our legitimate interests to respond to your queries to ensure that we provide a good service to Users and troubleshoot problems

		device that you use to contact us	
To block accounts as part of our anti-spam procedures	Email address, phone number, IP address and IP session information, social network ID, username, user agent string	You provide your email address, phone number and username to us. We obtain the other information from the device that you use to access the service	Legitimate interests – it is in our legitimate interests to prevent unauthorised behaviour and to maintain the safety and security of our services
To investigate and block Users for reported infringements of our Terms and Conditions of Use	Name and user registration details, profile information, content of messages and photographs	You provide your name, profile content and activities on the App to us	Legitimate interests - it is in our legitimate interests to prevent unauthorised behaviour and to maintain the safety and integrity of our services
To enable Users to create and enhance their Stumbl1 profile and log into the App via third party accounts	Data from Facebook and other third-party accounts (see section 7 of this Privacy Policy for more details)	We obtain this information from Facebook, or the providers of any other accounts you use to log in or connect with your	Legitimate interests – it is in our legitimate interests to facilitate access to our services

		Stumbl account	
To block payment transactions as part of our anti-fraud procedures	Name, IP address, email address, mobile number, cardholder name, payments received, type of payment, user ID, country	You provide your name, email address, mobile number and card details to us. We obtain your IP address from the device that you use to contact us. We obtain your payment information from your interactions with our service	Legitimate interests – it is in our legitimate interests to prevent fraudulent transactions and to maintain the security of our services
To serve promo cards and advertisements on the App	Location, gender, age, and information that you have optionally provided us with via your profile	We obtain age, gender and profile information from you, and location data from the device that you use to access the service	Legitimate interests – it is in our legitimate interests to target advertisements so that Users see relevant advertisements and to allow us to generate income from advertising revenue
To serve advertisements on third party networks and measure the effectiveness of such ads	Data about your visit to our Sites or App and action taken on those (for example if you downloaded our App or created an	We obtain age and gender from you and we obtain	Consent – as indicated by you in your Privacy Settings/Cookies Settings preferences and



	account with Stumbl), IP address (and your estimated location based on your IP address), age and gender, device ID	other information from the device or browser that you use to access the service	via your browser or device privacy preferences (where required by your device manufacturer, for example Apple devices using iOS 14.5).
To contact you in order to run surveys for research purposes and to obtain feedback, and to find out if you want to take part in marketing campaigns	Email address and mobile phone number	You provide this information to us	Legitimate interests – it is in our legitimate interests to carry out research so that we can further develop the app and improve the service
To enable video and audio sharing functions on the app & sharing the same via other apps on the user's mobile phone	Video and audio call usage data, images and video	We obtain this information from the device that you use to access the service	Legitimate interests – it is in our legitimate interests to provide these functionalities as part of the services
To defend legal claims, protect legal rights and to protect people from harm	This could include any information that is relevant to the issue	This information may be obtained directly from you, from your device or from third parties, depending on the information involved	Legitimate interests – it is in our legitimate interests to protect our legal rights, defend legal claims and to protect our Users and third parties from harm
To understand User interest & preference	Interactive Date: This includes but is not limited to the	You provide the data by	Legitimate interests – it is in our legitimate

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interactive buttons that you use on the your feed, the places you have been or checked into, the time you have spent on other user's profile and/or advertisement.

liking or disliking posts that appear in your feed.

interests to carry out research based on your likings and preferences to enhance user experience and target audience for market research basis. This also helps us to prioritise your feed.

### 3. DISCLOSURE OF INFORMATION.

Our policy is to not disclose your Registration Information or personal data, except in the limited circumstances described here:

**Service Providers** – We engage certain trusted third parties to perform functions and provide services to us. We may share your Registration Information or personal data with these third parties, but only for the purposes of performing these functions and providing such services.

**Moderators** – To monitor activity on the App and approve content.

**Payment Processing and Telecommunications Companies** – To facilitate payments for our premium services.

**Law and Harm** – As we mentioned in the Terms & Conditions we think it is very important that all Users behave whilst using the App. We will cooperate with all third parties to enforce their intellectual property or other rights. We will also cooperate with law enforcement enquiries from within or outside your country of residence where we are required to by law, where there is an investigation into alleged criminal behaviour or to protect the vital interests of a person.

**Business Transfers** – In the event that a Stumblly entity or any of its affiliates undergoes a business transition or change of ownership, such as a merger, acquisition by another company, re-organisation, or sale of all or a portion of its assets, or in the event of insolvency or administration, we may be required to disclose your personal data.

**Marketing Services Providers** – To help us serve marketing and advertising on third party websites and applications and measure the effectiveness of our advertising

**Anti-Spam and Anti-Fraud** – Your data may be shared with other Stumblly Group companies, for example, to block accounts and suspected fraudulent payment transactions as part of our anti-spam and anti-fraud procedures.

**Aggregated Information** – We may share aggregated information with third parties that includes your personal data, which does not identify you, together with other information including log data for industry analysis and demographic profiling.

Stumblll does not sell your data and has not sold your personal data in the previous 12 months.

## **MORE INFORMATION ABOUT DISCLOSURES**

### **Sharing your personal data with Service Providers**

We engage certain trusted third parties to perform functions and provide services to us (“Service Providers”). The suppliers with which Stumblll shares User personal data vary depending on a variety of factors, such as which of our App, Sites and services a User engages with. For example, to provide our services to Users, we typically use the following suppliers:

- Billing services – to allow customers to purchase paid features of our App (
- Authentication services – to allow Users to authenticate their account
- Social media providers – to allow Users to create/connect their Stumblll account with their account(s) on such platforms
- Product improvement and market research – we use third party platforms and agencies to carry out customer surveys and market research to improve our products and services
- IT services – some of the third-party software providers used in the operation of our business may process Users’ personal

We carry out due diligence on all Service Providers we engage to ensure they have adequate data protection and information security measures in place and only provide them with the personal data necessary to the service they are providing. Measures are taken to ensure that the data shared is non-attributable to the greatest extent possible and our suppliers are also subject to extensive obligations under our contractual arrangements, including strict data retention limits.

## **4. WHAT OTHERS MAY SEE ABOUT YOU.**

We want our users to show the world their live content. Our App is designed to make it easier for you to connect with other Users and to interact with them.

When using the Stumblll App, you should assume that **anything** you post or submit on the App may be publicly-viewable and accessible, both by Users and non-users of the App. We want our Users to be careful about posting information that may eventually be made public.

Please be careful about posting sensitive details about yourself on your profile such as your religious denomination and health details. You may also choose to add sensitive information about yourself when you add certain Stumblll badges to your profile. While you may voluntarily provide this information to us when you create your profile there is no requirement to do so. Please remember that photographs that you post on Stumblll may reveal information about yourself as well. **Where you do upload and choose to tell us sensitive information about yourself, including through the addition of badges to your profile, you are explicitly consenting to our processing of this information and making it public to other Users.**

Your Stumblly profile and other information you make available via the App, including certain information added to your profile through third party accounts (such as Facebook, Google or Apple – see section 7 of this Privacy Policy for more information about this) may be viewed and shared by Users with individuals who may or may not be users of the App. For example, a User may recommend you as a match to his or her friend(s) by taking a screenshot of your profile picture and sharing it, regardless of whether such friend(s) is also a User of the App.

## **5. OUR POLICY TOWARDS AGE.**

Although we want as many people as possible to enjoy our creation, you have to be at least 18 years old to use the App.

Stumblly does not knowingly collect any information about or market to children, minors or anyone under the age of 18. If you are less than 18 years old, we request that you do not submit information to us. If we become aware that a child, minor or anyone under the age of 18 has registered with us and provided us with personal information, we will take steps to terminate that person's registration and delete their Registration Information from Stumblly. If we do delete a profile because you violated our no children rules, we may retain your email and IP address to ensure that you do not try to get around our rules by creating a new profile.

## **6. SECURITY.**

Here at Stumblly, we pride ourselves on taking all appropriate security measures to help protect your information against loss, misuse and unauthorised access, or disclosure. We use reasonable security measures to safeguard the confidentiality of your personal information such as secured servers using firewalls.

Unfortunately, no website or Internet transmission is ever completely 100% secure and even we cannot guarantee that unauthorised access, hacking, data loss or other breaches will never occur, but here are some handy tips to help keep your data secure:

1. Please make sure you log out of your Account after use as you never know who may stumble onto your Stumblly Account.
2. Please don't share the password you use to access your Stumblly Account with anyone else.
3. Change your password periodically.

If you ever think someone has had access to your password or Account, please follow e-mail us at **hello@stumblly.com**. We cannot guarantee the security of your personal data while it is being transmitted to our site and any transmission is at your own risk.

## **7. LINKING YOUR APPLE/GOOGLE/FACEBOOK ACCOUNTS TO YOUR STUMBLLY ACCOUNT.**

The User can implement their own login system where they sign up on the app using their email and password and an account is created for them. In this scenario, the Stumbll team will be sending an auto-generated e-mail to verify the user's e-mail ID.

Alternatively, the user can choose to use Apple/Google/Facebook completely for their login system. In this scenario, the user signs up using their respective choice of platform and the authentication and login is then managed by the chosen platform.

The user must be aware that in any situation he/she decides to sign in with their e-mail ID after they have registered from one of the platforms such as Apple/Google/Facebook they will have to use the same e-mail ID used before or else it will result in the creation of another account. We kindly request the users to be aware about the same.

We only receive the limited information that Apple/Google/Facebook permits to be transferred. This only includes login details and basic information necessary for the authentication of login.

If you no longer want to link your Stumbll account to your Apple/Google/Facebook, please visit the settings in Apple/Google/Facebook account and follow the instructions to remove the Stumbll app access permissions. Please note that any information already added to your Stumbll account from those platforms will not be deleted unless you delete it within your Stumbll account as well.

## 8. YOUR RIGHTS.

Privacy laws applicable in India gives you the following rights:

1. Right to be informed: what personal data an organisation is processing and why (we provide this information to you in this Privacy Policy).
2. Right of access: you can request a copy of your data.
3. Right of rectification: if the data held is inaccurate, you have the right to have it corrected.
4. Right to erasure: you have the right to have your data deleted in certain circumstances.
5. Right to restrict processing: in limited circumstances, you have the right to request that processing is stopped but the data retained.

If you want to exercise any of your rights listed above, please contact us at **hello@stumbll.com**.

If you have a concern about how we have processed your request or your personal data, you should contact us in the first instance at **hello@stumbll.com**.

## 9. DATA RETENTION AND DELETION.

We keep your personal information only as long as we need it for the legal basis relied upon (as set out in Section 2 above) and as permitted by applicable law.

You may permanently delete your Account at any time.

When your Account is deactivated, we take reasonable efforts to make sure it is no longer viewable on the App. For up to 30 days, it is still possible to restore your Account if it was accidentally or wrongfully deactivated. After 30 days, we begin the process of deleting your personal information from our systems, unless:

1. we must keep it to comply with applicable law (for instance, if you make purchases within the App, some personal data may need to be kept for accounting purposes);

2. we must keep it to evidence our compliance with applicable law;
3. there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
4. the information must be kept for our legitimate business interests, such as fraud prevention and enhancing Users' safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behaviour or security incidents from opening a new account.

Where Stumblly uses machine learning, for example, to help us detect and prevent fraudulent card transactions, and to detect and prevent spam communications on the App (as explained above), we may need to keep personal information for a longer period than the retention periods explained above, to enable the machine learning to work properly. Where this is the case, we always seek to minimise the amount of personal information that is used and we ensure that it is ring-fenced and kept securely from other User personal information. We regularly review the period for which personal information is required for machine learning purposes and delete any identifiable information when it is no longer required. To prevent abuse and/or misuse of Stumblly by a User following termination or deletion of a profile/Account we shall retain such information as we deem in our sole discretion may be necessary to ensure that User does not open a new Account and profile in breach of our Terms & Conditions and to ensure compliance with all laws and regulations.

**Warning:** Even after you remove information from your profile or delete your Account, copies of that information may still be viewable and/or accessed to the extent such information has been previously shared with others, or copied or stored by others. We cannot control this, nor do we accept any liability for this. If you have given third party applications or websites access to your personal information, they may retain such information to the extent permitted under their terms of service or privacy policies.

## 10. CHANGES TO THIS POLICY.

As Stumblly evolves, we may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be available at [stumblly.com](http://stumblly.com). If we make a change to this policy that, in our sole discretion, is material, we will notify you, for example, via an email to the email associated with your Account or by posting a notice within Stumblly.

### Effective date

This Privacy Policy was last updated 25<sup>th</sup> May 2021.

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