

# Privacy

Effective: December 15, 2016

## WILLOW PRIVACY POLICY

This Privacy Policy (this “Policy”) applies solely to information collected through the web site located at the URL: [www.hiwillow.com](http://www.hiwillow.com) and subdomains (the “Platform”) ; whether accessed via computer, mobile device or other technology. The Platform is offered by Portofino Labs, Inc. (“Willow”, “we”, “us”, “our”).

This Privacy Policy explains what information may be collected through the Platform, how such information may be used and/or shared with others, how we safeguard it and how you may access and control its use in connection with our marketing communications and activities.

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### INFORMATION COLLECTED ON OUR SITE

#### Information You Provide To Us

When you use the Platform for example to register to create an account, participate on a blog, use the Platform to update your information, sign up for a subscription, purchase items or enter into promotions, we or our service providers may collect Personal Information (information that could reasonably be used to contact you or to identify you personally).

When you register with Willow you will submit a variety of information about yourself (such as name, email address, mailing address and gender), and we will also collect other optional information you may choose to provide as part of such registration.

We may allow you to create your Platform account by logging in through a social networking site such as Facebook (“Social Services”). Integration with Social Services allows us to offer a more personalized experience to you when you use the Platform. When you log into the Platform using your Social Service account, the Social Service will provide us with access to certain information that you have provided to that Social Service (such as your profile picture, interests, and connections), and we will use, store and disclose such information in accordance with this Policy. Please remember that the manner in which Social Services use, store and disclose your information is governed by the terms and conditions and privacy policies of each Social Service, and not by us.

You may decide to provide us with another person’s email or phone number so that person may be invited to join Willow or so that we may facilitate your communication with other people through the Platform. You may also provide us with another person’s contact information for purposes of delivering information through another messaging platform (such as email). We use this information to contact and, if necessary, remind that person that he or she has been invited to join Willow. All invitees are provided with the option not to receive further invitations and communications from Willow. We may disclose such information if required to do so in order to comply with legal process, as described above.

### Information Collected Automatically

**Usage Information.** Whenever you visit or interact with the Platform, Willow, as well as any third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the Platform is accessed and used (“Usage Information”). Usage Information may include, in part, browser type, operating system, the page served, product information viewed, the time, and the preceding page views. This statistical usage data provides us with information about the use of the Platform, such as how many visitors visit a specific page on the Platform, how long they stay on that page, and which hyperlinks, if any, they “click” on. This information helps us keep our website fresh and interesting to our visitors and tailor content to a visitor’s interests.

**Device Identifiers.** Willow may also automatically collect your IP address or other unique identifier (“Device Identifier”) for the computer, mobile device, technology or other device (collectively, “Device”) you use to access the Platform. A Device Identifier is a number that is automatically assigned to your Device when you access a web site or its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer the Platform, help diagnose problems with our servers, analyze trends, track users’ web page movements, and to help identify and gather broad demographic information for aggregate use.

**Cookies; Pixel Tags.** The technologies used on the Platform to collect Usage Information, including Device Identifiers, may include but are not limited to: cookies (data files placed on a Device when it is used to visit the Platform), mobile analytics software and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a

web page or in an email, which indicates that a page or email has been viewed). Cookies may also be used to associate you with social networking sites and, if you so choose, enable interaction between your activities on the Platform and your activities on such social networking sites. We, or our vendors, may place cookies or similar files on your Device for security purposes, to facilitate site navigation and to personalize your experience while visiting our Platform (such as allowing us to select which content, ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information). A pixel tag may tell your browser to get content from another server.

Third party analytics service providers will receive data regarding your usage of the Platform in order to provide analytics services to us. As of the date of this Policy, these service providers include Google Analytics. For information about the privacy practices of these services providers, you can visit

<http://www.google.com/policies/privacy/partners/>. If you elect to opt-out of data collection by these service providers (to the extent available) and subsequently use the Platform through a different device or otherwise change your cookie or privacy settings on your device, you will need to opt-out again.

To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser's cookie folder, please refer to your browser's help menu or other instructions related to your browser. If you do disable or opt out of receiving cookies, please be aware that some features and services on our Platform may not work properly because we may not be able to recognize and associate you with your account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests. Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, so note that our systems are not configured to recognize Do Not Track headers or signals from some or all browsers.

You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on cookies and how to block cookies using different types of browser.

We do not receive your credit card number or billing information when you make any transaction on or through the Platform. Credit card and billing information is collected directly by third-party payment services provider. Please visit such third-party payment services provider's website or contact them if you have questions regarding their privacy practices.

## HOW WE USE THE INFORMATION COLLECTED THROUGH OUR SITE

Any information you submit on the Platform will be used to: respond to your questions and requests; provide you with access to certain areas and features of the Platform; verify your identity; communicate with you about your activities on the Platform; tailor content, advertisements, and offers we serve you; market research, Platform analytics and

operations; improve or troubleshoot the Platform; contact you with regard to your use of the Platform and interest in certain products, and, in our discretion, changes to any Willow policy; and for purposes disclosed at the time you provide your Personal Information or otherwise with your consent.

If you use a Social Service to log-in to your Platform account, we may give you the ability to invite your Social Service connections to use the Platform and connect you to your Social Service connections on the Platform.

Willow may use information derived from your use of the Platform to determine what content we believe may be of interest to you, including content from the providers of goods and services that you may be able to purchase through the Platform or otherwise (who may pay us to show you such content). Note that if a third party content provider asks us to show content to users with certain characteristics (for example, women ages 50-54) or a segment of that group (for example, women ages 18-24 who have indicated they are trying to save) and you respond to that content or click on links embedded in that content, the third-party content provider may conclude that you have the characteristics of the audience that they are trying to reach. Willow does not have access to or control over cookies, web beacons, or other technologies that third parties who have asked us to show you content may use, and the privacy practices of these third parties are not covered by this privacy policy. For more information on available opt-out options for targeted advertising delivered by NAI member ad networks, see <http://www.networkadvertising.org/>; and for more information on advertising using cookies and how to opt out of advertising cookies specifically, please see Targeted Advertising below.

## SHARING OF INFORMATION

Except as provided in this Privacy Policy, we will not provide any of your Personal Information to any third parties without your consent. We may share non-Personal Information, such as aggregate user statistics, demographic information, and Usage Information with third parties. We may also share your information as disclosed at the time you provide your information, as set forth in this Privacy Policy and in the following circumstances:

**Third Parties.** In order to carry out your requests, to make various features, services and materials available to you through the Platform, and to respond to your inquiries, we may share your Personal Information with third parties that perform functions on our behalf, such as companies or individuals that: host or operate our Platform; payment processors; analyze data; provide customer service; advertisers; sponsors or other third parties that participate in or administer our promotions.

**Your Agreement to Have Your Personal Information Shared.** While on our Platform, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else or to otherwise consent to the sharing of your information with a third party.

If you use the social sharing features of the Platform, your information may be shared with certain of your friends or groups. If you agree to have your Personal Information shared, your Personal Information will be disclosed to the third party and the Personal Information you disclose will be subject to the privacy policy and business practices of that third party.

**Business Transfers.** If another entity acquires us or all or substantially all of our assets, or assets related to the Platform, Personal Information, Usage Information, and any other information that we have collected about the users of the Platform may be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

**Legal Disclosure.** Willow may transfer and disclose information, including your Personal Information, Usage Information and Device Identifier, (including IP address), to third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Use or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our Platform or the public.

## TARGETED ADVERTISING

We may use third party ad network providers to help present ads on the Platform and elsewhere on the Internet, as well as other service providers to evaluate and provide us with information about the use of the Platform and viewing of our content. Such providers may place and access cookies, pixel tags, or similar technologies on your Device to serve you ads or other content personalized to your interests which they infer from your browsing on the Platform and other sites you have visited. In doing so, the provider collects or has access to non-Personal Information such as your Usage Information. The use of cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

If you do not want to receive the benefits of targeted advertising, you may opt out of some network advertising programs that use your information by visiting the NAI Opt-Out Page at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) or the Digital Advertising Alliance consumer choice page at [www.aboutads.info/choices](http://www.aboutads.info/choices). Please note that even if you choose to remove your information (opt out), you will still see advertisements while you're browsing online. However the advertisements you see may be less relevant to you and your interests. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page and the DAA consumer choice page provide mechanisms to opt out of receiving cookies from those companies. Please note that if you opt-out of targeted

advertising, we may still track your visits to the Platform for our own analytics, operations and security purposes.

## YOUR CHOICE AND ACCESS

You may always direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters, e-mails or other communications by: (i) sending us an e-mail at [help@hiwillow.com](mailto:help@hiwillow.com); (ii) contacting us by mail at Willow, 1475 Veterans Blvd., Redwood City CA 94063, or (iii) following the removal instructions in the communication that you receive. Your opt-out request will be processed within 30 days of the date on which we receive it. Please note that if you opt-out of various uses of your Personal Information the service we provide to you and relevant offers may be impacted.

If you wish to verify, correct, or update any of your Personal Information collected through the Platform, you may contact us at the above address or e-mail. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Platform. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

## CHILDREN.

The Platform is not directed to children under 13. We do not knowingly collect Personal Information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent.

## SECURITY OF YOUR INFORMATION.

We use certain reasonable security measures to help protect your Personal Information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Platform and provide us with your information at your own risk.

## OTHER SITES.

The Platform may contain links to other sites that we do not own or operate. This includes links from service providers, advertisers, sponsors and partners that may use our logo(s) as part of a co-branding agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other web sites may send their own cookies to your Device, they may

independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

#### CONSENT TO PROCESSING.

The Platform is governed by and operated in, and in accordance with the laws of the United States. We make no representation that the Platform is governed by or operated in accordance with the laws of any other nation. If you are located in the European Union, Canada or elsewhere outside of the United States, please be aware that information we collect may be transferred to and processed in the United States. By using the Platform, or providing us with any information, you (a) acknowledge that the Platform is subject to the laws of the United States, (b) consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (c) waive any claims that may arise under those laws.

#### CHANGES

Please note, we may change information on the Platform and/or this Privacy Policy, at any time without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy on the Platform.

#### CONTACT US.

If you have any questions or concerns regarding this Privacy Policy, please contact us at:

Attn: Legal Dept  
Re: Willow Privacy Policy  
Telephone: (415) 523-0610  
E-Mail: [help@hiwillow.com](mailto:help@hiwillow.com)