

## Key Revolution Inc. PRIVACY POLICY

Last Modified on June 1, 2022

### **Our Privacy Commitment**

Key Revolution Inc. (“**Key Revolution**,” “**we**,” “**us**” or “**our**”), a Delaware corporation, with its principal place of business at 36700 Trousdale Pkwy, Bridge Hall B1F, Los Angeles, CA 90089 is committed to respecting the privacy rights and concerns of all users of the Key Revolution, website where this Privacy Policy is posted [www.lowkeychat.com](http://www.lowkeychat.com) (the “**Site**”), Key Revolution’s mobile application “Lowkey” (the “**App**”), and the services and the software made available by Key Revolution (collectively with the Site and the App, the “**Service**”). As such, we have established and implemented this Privacy Policy to inform visitors to the Site and users of the Service how we use and protect the information we collect through the Service. By visiting the Site or using any part of the Service, you consent to Key Revolution’s collection, use, storage, deletion and disclosure of information relating to you as set forth in this Privacy Policy. This Privacy Policy is effective as of the date set forth above and is only applicable to the Site and not to any other website that you may be able to access from the Site which may have its own data collection and use practices and policies.

This policy answers the following questions:

- • What information do we collect about you and how do we use it?
- • Will we share your personal data with third parties?
- • What choices do you have about the collection and use of your personal data?
- • What security measures do we take to safeguard your personal data?

Lowkey utilizes encryption to provide private messaging (“Services”). Your text messages are always encrypted, so they can never be shared or viewed by anyone but yourself and the intended recipients who are part of your group chat.

Key Revolution is hosted and operated in the United States and is subject to United States law. Please do not provide us with any information or attempt to access the Site, App or Services if you live outside of the United States. If you are from a jurisdiction outside of the United States, please notify us so that we may take necessary action. This may include terminating your account and deleting your information. We are committed to resolving those issues, so if you have any questions about how we collect or use your information you may email us at [vili@lowkeychat.com](mailto:vili@lowkeychat.com).

### **What information do we collect about you and how do we use it?**

#### **Types of Information We Collect**

Personal data means information that can be used to identify and contact you. You need to submit personal data to access the Service.

We collect personal data when you create an account through the Service, fill out registration forms,

participate in chats and/or receive customer or technical support.

To create an account for the Service, we require you to provide certain data including your name and phone number. Additionally, at your option, you may provide additional information beyond what is required to create an account, such as age, your college, school email, class, gender, a profile picture, access to your phone's contact list, photo galleries, payment transfer credentials, microphone, camera and enabling the sharing of location services, which will enable you to gain more from the Service. If you sign up for one of our services which involves social networking sites, or access to your contacts, we may also collect personally identifiable information from these internet sources and database services. When you are purchasing advertisements, event tickets, or transferring money through the Service, you will also be required to provide a billing address and credit card or other payment information. No information of this type will be collected unless you have registered for services that require it. With your express consent, you may be able to upload, import or sync contact information from your mobile device (for example, from your address book) to Lowkey. This information may include Personal Information such as your name, phone numbers, email addresses, photographs, and, in certain circumstances, your school and/or district, class, group, club, team or Organization affiliation or any other information necessary for us to provide our Services.

### **How We Use Your Personal Data**

The personal data you provide to us will allow us to verify a user and connect users with their friends through the Service, add you in to groups where your friends are participating also, fulfill your product or service order; alert you of new products or services, features, or enhancements; handle your customer service questions or issues; and notify you of promotions, updates, or special offers that we think may interest you. We also use your phone number as part of the Service in sending you messages and notifications about the Service and other general announcements. This includes, but is not limited to, contacting through email, text or in-app messaging. We may use in-app messaging in order to contact you directly and ask customer feedback to better our products and services for you. We may respond to your requests, feedbacks and messages via in-app messaging.

We keep track of your interactions with us, including but not limited to your activity within the Service. We may use personal data that you provide to us to send messages to you in response to your request to perform an activity in connection with your use of any of the Service. We may also use your personal data to contact you when necessary.

We may use your personal data with non-personal data that we have collected in a manner such that the end-product does not personally identify you or any other user of the Service. We may make your personal data non-personally identifiable by either combining it with information about other users (aggregating your personal data with information about other users), or by removing characteristics (such as your name or email address) that make the information personally identifiable. This process is known as de-personalizing your information. You grant us a royalty-free, worldwide, perpetual, irrevocable and fully transferable right and license to use your personal data in connection with the creation and development of analytical and statistical analysis tools relating to the use of the customer data we collect in providing the Service (the "*Analytical Data*"). We are expressly authorized to make any commercial use of the Analytical Data, including without limitation, sharing the Analytical Data with third parties, provided that we do not sell, trade, or otherwise transfer from us any part of the Analytical Data that personally identifies any users of the Service.

In order for your Personal Data to be processed in accordance with this Privacy Policy, such data may be transferred to one or more other countries that may or may not be within yours. We guarantee that such transfers are carried out in such a way as to ensure that the data remains confidential and secure and that it is adequately protected in accordance with the regulations in force for the protection of personal data. In this case, we offer guarantees provided by current regulations, such as standard contractual clauses approved by the European Commission, which represent commitments made between companies that transfer Personal Data in order to ensure that such data remains confidential and secure.

### **Do Not Track**

In compliance with California legislation, AB370, effective January 1, 2014, Key Revolution's practices in responding to "do not track" signals and collecting user information over time and across a network of websites when you visit the Site are as follows: We do honor the request of "do not track" signals sent by your browser when you visit the Site. Additionally, Key Revolution may collect user information about your online activities over time and across different websites and may authorize third parties to do so.

### **Cookies**

"Cookies" are small bits of electronic information that a website sends to a visitor's browser and are stored on the visitor's hard drive. Like many websites, we may choose to employ cookies in certain areas of the Site to allow us to provide information to make your online experience more convenient. For example, when you return to the Service after logging in, cookies provide information to the Service so that the Service will remember who you are on subsequent visits, speeding up or enhancing your experience of the Service by, for instance, tailoring content to you.

### **Log Information**

Our servers automatically record, and we collect other personal data that your browser or mobile device sends whenever you visit the Service. This information includes, among other things, your access times, Internet Protocol address, the search engine you used to find the Service, if any, type of mobile device, device identification number, geographic location, which parts or elements of the Service you use and when and how long you use them. We use this information to monitor and analyze how users use the Service, to provide customer service and to maintain and improve the Service.

### **Children's Privacy**

You must be at least 13 years old or otherwise the age of majority in your jurisdiction in order to obtain an account for the Service.

We do not knowingly collect personal data from children under 13 or allow them to create an account for the Service. We take children's privacy seriously and encourage parents to play an active role in their

children's online experience at all times.

### **Google Analytics for Firebase**

Key Revolution uses Google Analytics for Firebase to help us provide functionality across the Site and App, providing access to analytics databases, messaging and reporting of crashes to provide better experiences to users. Key Revolution has implemented Google Analytics for Firebase features including but not limited to Analytics, Cloud Messaging, Events, Conversions, Audiences, Latest Release, Retention and StreamView. It may collect data including use of identifiers for mobile devices including Android Advertising ID and Advertising Identifier for iOS, or other third-party identifiers, together.

### **Will we share your personal data with third parties?**

#### **Sharing of Information**

We use your personal data to respond to your requests, deliver products and services you request, and send communications to you about promotions, updates, or special offers (which may be offered by Key Revolution or one of its business partners) that may be of interest to you. We may share your personal data with carefully selected vendors and business partners, including companies that perform marketing services and other business operations for us. We may also use your personal data to provide analyses of our users in the aggregate (including Analytical Data subject to the terms of this Privacy Policy) to prospective partners and other third parties, including but not limited to Amazon and Google. In addition, we will share the personal data we collect from you under the following circumstances:

- • *Protection of rights.* We will share personal data if we have a good faith belief that (i) access, use, preservation or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, legal process, such as a court order or subpoena, or a request by law enforcement or governmental authorities, (ii) such action is appropriate to enforce our [Terms of Use](#) for the Service, including any investigation of potential violations thereof, (iii) such action is necessary to detect, prevent, or otherwise address fraud, security or technical issues associated with the Service, or (iv) such action is appropriate to protect the rights, property or safety of Key Revolution, its employees, users of the Service or others.
- • *Asset transfers.* If we become involved in a merger, acquisition or other transaction involving the sale of some or all of Key Revolution's assets, user information, including personal data collected from you through your use of the Service, could be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you through email and/or a prominent notice on the Site.
- • *Service Providers.* We may share your personal data with service providers (including our affiliates, independent sales representatives, and brand ambassadors that provide services on our behalf) that we engage for the purpose of processing information on our and your behalf. For example, we may partner with other companies to process payments for the Service. Additionally, we may partner with other companies to process, analyze, and/or store data, including, but not limited to, Analytical Data. While providing services for us, these companies may access your personal data. If you use other Third-Party Services like YouTube, Spotify, Tenor, etc. in connection with our Services, their Terms and Privacy Policies govern your use of those services. To the extent applicable, we require these entities to comply with this Privacy Policy and appropriate confidentiality and security measures. Here are some examples of third-party content and services available through or via the Service:

- ○ Infrastructure – We use Amazon Web Services to support our Services.

### **Disclosure of Your Information for Security Purposes**

Key Revolution fully cooperates with law enforcement agencies in identifying those who use our services for illegal activities. We will release personal or general information without your consent for security purposes, when required by law, or to prevent imminent harm to any person or entity. We will disclose personal or general information upon receipt of a court order or subpoena, or to cooperate with a law enforcement investigation, which may include responding to requests and court orders from jurisdictions outside the United States. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful, as determined in our sole discretion. If we receive such a request we may, but are not required to, notify you of such request and give you an opportunity to respond.

### **Opting Out of Receiving Communications from Us**

If you no longer want to receive our newsletter, emails or other announcements, you may unsubscribe by selecting “unsubscribe” in your account, writing to us at [vili@lowkeychat.com](mailto:vili@lowkeychat.com) or replying to the unsubscribe link at the bottom of our emails. Please note that you cannot unsubscribe from certain correspondence from us, including messages relating to your account transactions, and we may notify customers of any unauthorized access of their personal data by email or text messaging.

### **Mediation**

You agree that, in the event any dispute or claim arises out of or relating to this Privacy Policy, that you and Key Revolution will attempt in good faith to negotiate a written resolution of the matter directly between the parties. You agree that if the matter remains unresolved for forty-five (45) days after notification (via certified mail or personal delivery) that a dispute exists, all parties shall join in mediation services in Los Angeles, California, with a mutually agreed mediator in an attempt to resolve the dispute. Should you file any arbitration claims, or any administrative or legal actions without first having attempted to resolve the matter by mediation, then you agree that you will not be entitled to recover attorneys’ fees, even if you would otherwise be entitled to them.

### **What security measures do we take to safeguard your personal data?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. Key Revolution may collect personal data from you, in which case the personal data is stored on servers by Amazon, located in a secure and environmentally controlled location and protected by protocols and procedures designed to ensure the security of such information including firewalls, Secure Sockets Layer, encryption methods and password protection features. In addition, we restrict access to personal data to Key Revolution employees, independent contractors and agents who need to know this information in order to develop, operate and maintain the Service. All Key Revolution personnel who have access to this information are trained in the maintenance and security of such information. However, no server, computer or communications network or system, or data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect user information, we cannot ensure or warrant the security of any information you transmit to us or through the use of any of the Service and you acknowledge and agree that you provide such information and engage in such transmissions at your own risk. Once we receive a transmission from

you, we will endeavor to maintain its security on our systems.

In the event that personal data you provide to us is compromised as a result of a breach of security, when appropriate we will take reasonable steps to investigate the situation, notify you and take the necessary steps to comply with any applicable laws and regulations.

### **Governing Law**

This Privacy Policy and our privacy practices will be subject exclusively to the laws of the State of California within the United States of America. By using our Service, you hereby irrevocably submit to the exclusive jurisdiction of the competent courts of California any claim or matter arising under or in connection with the Service.

### **Notification of Changes**

This Privacy Policy may change from time to time and we will post all changes on this page.

### **Questions? Contact Us**

If you have any questions about privacy and our data policies, please contact [vili@lowkeychat.com](mailto:vili@lowkeychat.com). You will get a copy of your Lowkey data and we will answer at the earliest opportunity.

If you have any questions about our privacy practices or this Privacy Policy, please contact us by email at [vili@lowkeychat.com](mailto:vili@lowkeychat.com) or otherwise at:

Key Revolution Inc.

36700 Trousdale Pkwy.

Bridge Hall, B1F

Los Angeles, CA 90089

Attn: CEO

### **Terms of Use**

Please read the [Terms of Use](#) governing the use of the Site, App and the Service.