

PRIVACY POLICY

Your Privacy Rights

Effective Date: September 07, 2021

This Privacy Policy describes the types of information gathered by OkTY C Corporation, its affiliates (including Ivy Koin LLC doing business as OkTY), and subsidiaries (collectively, “OkTY”, “us” or “we”) in the process of providing this website, <https://www.okty.app/>, (the “Site”), a software application for mobile devices (the “App”), and the associated services, data, information, tools, functionality, updates and similar materials (collectively, the “Service”), how we use it, with whom the information may be shared, what choices are available to you regarding collection, use and distribution of information and our efforts to protect the information you provide to us through the Service. It is important that you take the time to read and understand this Privacy Policy so that you can appreciate how we use your personal information.

By using the Service, you hereby consent to allow us to process information in accordance with this Privacy Policy. Please also refer to our Terms of Service, available here <https://www.okty.app/>, which are incorporated as if fully recited herein. Terms defined in the Terms of Service that are not defined herein shall have the same definition as in the Terms of Service.

This policy is subject to change. If our information retention or usage practices change, we will let you know by posting the Privacy Policy changes on the Service and/or otherwise making you aware of the changes. Your continued use of the Service following our notice of changes to this Privacy Policy (or other method of legal acceptance) means you accept such changes. Please refer to the “Effective Date” above to see when this Policy was last updated.

Territoriality

Regardless of where our servers are located, your personal data may be processed by us in the United States, where data protection and privacy regulations may or may not be to the same level of protection as in other parts of the world. In all instances in this Privacy Policy, “our servers” means servers that we own or on which the Service is hosted, or which are otherwise utilized by the Service. **BY VISITING THE SITE AND USING THE SERVICE, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY INFORMATION COLLECTED OR OBTAINED BY US THROUGH VOLUNTARY SUBMISSIONS, AND, TO THE EXTENT POSSIBLE, THAT U.S. LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING.**

1. Who Collects Your Personal Information On Our Service?

We do. We collect information from you on the Service, and we are responsible for protection of your personal information, sometimes also referred to as personally identifiable information, (collectively, “PII”).

2. What Information Does OkTY Collect?

A. Requested Information. We collect certain personal information about you, which may be supplied when you register for the Service, when you create or update your account, when you use the Service, from social media platforms, other third parties, or otherwise when you submit such information. The types of PII that we collect and save include:

- Contact and account information, such as name, address, email address, phone number, payment account information (e.g. your bank account and routing numbers, credit card numbers and cvv codes), and other types of personal information collected through the Service’s optional social media integration; and
- Technical information, collected in our logs and via cookies. Such information may include standard web log entries that contain your device identifiers (including mobile devices) and information, operating system information, usage statistics, clickstream data, IP address, notifications of when you have read an email that we sent you, previous page URL, referring page URL and timestamps.

You may provide us with information when you interact with us through email, submit a review or a post, or through other use of the Service. We may retain such information in order to provide you with services, and you agree that we may share this information as needed with other users in order to resolve any issues that may arise between you and another user of the Service.

The Service may be integrated with third party social media platforms, such as Facebook, LinkedIn, Instagram, and others (collectively, the “Platforms”). If you choose to interact with the Platforms through the Service, the Platforms may make additional PII about you available to us.

The Service also the ability to send you push notifications and access the internet or use your mobile data plan in order to use certain features of the Service.

We may also collect location-based information about you.

B. Non-personal Information. Non-personal information is non-personally identifiable or anonymous information about you, including but not limited to links and materials posted, the type of device you used and its operating system, browser information, the pages accessed most frequently, how pages and features are used, time spent on a page, when and how you use the App, search terms entered, and similar non-personal information.

Automatically tracking Internet Protocol (IP) addresses is one method of automatically collecting information about your activities online and information volunteered by you. An IP address is a number that is automatically assigned to your device whenever you surf the internet. Further, the Service may utilize web beacons, pixel tags, first and third-party cookies, embedded links, and other commonly used information-gathering tools.

If non-personal information is paired to any of your PII, we will treat the non-personal information as if it were also PII.

C. Aggregate Information. We may also collect anonymous, non-identifying and aggregate information such as the type of browser you are using, the type of operating system you are using, the date and time of any request, language preference, referring site, and the domain name of your Internet service provider.

D. Payment and Financial Information. Although it may appear that we collect payment information from you on the Service, it is actually collected and processed through a third party service provider (“Payment Processor”) to process payments to you. The Payment Processor may collect bank account or credit card information from you on the Service. We do not hold your payment information. We may, however, collect some information about previous commercial and financial transactions (together, “Financial Data”) that you have made through the Service via third parties in order to enhance the functionality of the Service.

3. Why Is My Information Being Collected?

We need to collect your PII so that we can provide the Service, respond to your requests for information or, at your option, to integrate with Platforms, to enforce our Terms of Service, and to process your requests to access, and receive payment from, the Service. We also collect aggregate information to help us better design the Service. We collect log information for monitoring purposes to help us to diagnose problems with our servers, administer the Service, calculate usage levels, and otherwise provide services to you.

4. How Do We Use the PII We Collect?

A. We use the PII you provide for the purposes for which you have submitted it including:

- **Internal Uses.** We may use your PII to respond to your inquiries, fulfill your requests for information, track usage trends, conduct experiments, prevent fraud, develop and improve the Service and other offerings, and perform research and analytics.
- **Creating and Maintaining Your User Account.** We use your PII to create and maintain an account for you to allow you to purchase and use the Service.
- **Getting Paid by the Service.** Your payment information is collected and processed in order to pay you. We use third party service providers to facilitate payouts as set out in our Terms of Service.
- **Sending Administrative and Promotional Emails.** We may use your PII to send you emails to: (a) confirm your account information and your other PII; (b) provide you with information regarding the Service; (c) inform you of changes to this Privacy Policy, our Terms of Service, or our other terms, conditions, or policies;

or (d) provide you with information on our other services and products, or promotions related to the Service or our other services and products.

- **Social Media Integration.** We may use your PII to, at your request, integrate your social media accounts with the Service, and to provide to you the social media features of the Service.
- **Serve You Targeted Advertisements.** We may use your PII to serve you advertisements with the Service that are targeted to your interests.

B. We may use anonymous information that we collect to improve the design and content of our Service, and to enable us to personalize your internet experience. We also may use this information in the aggregate to analyze how our Site is used, as well as to offer you programs or services.

5. Do We Share Your PII?

We will not share your PII except: (a) for the purposes for which you provided it; (b) with your consent; (c) as may be required by law or as we think necessary to protect our organization or others from injury (e.g., in response to a court order or subpoena, in response to a law enforcement agency request, or when we believe that someone is causing, or is about to cause, injury to or interference with the rights or property of another); or (d) with persons or organizations with whom we contract to perform services for us, including the performance, or development of, aspects of the Service and other internal operations or business activities.

We do not disclose any PII to, nor do we have any connection or partnership with, social media sites, platforms, or companies.

We may also share aggregate information with others, including affiliated and non-affiliated organizations.

Finally, we may transfer your PII to a third party, or our successor-in-interest, in relation to, or in the event of, a merger, acquisition, sale of all or substantially all of our assets, reorganization, bankruptcy, or other change of control. After such disclosure or transfer, the third party or successor in interest may use the information in accordance with applicable law.

6. Are There Other Ways My Personal Data Could Be Shared?

You may elect to share certain personal information with individuals, entities, or with the public via your use of the Service. In this case, you will control such sharing via settings that we provide. For example, the Service may make it possible for you to publicly share information via Platforms such as Facebook, or Instagram. Be aware that when you choose to share information with friends, or with the public at large, you may be disclosing sensitive information, or information from which sensitive information can be inferred. Always use caution when sharing information through the Service. You understand and agree that we are not responsible for any consequences of your sharing of information through and beyond the Service.

7. How Can You Access And Control Your Information?

After becoming a user of the Service, you may view, revise or edit certain personal information associated with you by logging into the App and proceeding to your settings, or by sending an email to admin@okty.app.

For instructions on how you can further access your personal information that we have collected, or how to correct errors in such information, please send an email to admin@okty.app. Our Service allows you to select which third parties your information may be shared with in order to monetize your PII. To opt-in, or opt-out, of sharing with any such third party, you may edit the settings in your account, or email us at admin@okty.app at any time. Further, if you wish to opt-out of our use of your PII for reasons other than why you submitted it, or from receiving promotional emails from the Service, please email us at admin@okty.app and we will stop processing it, where required by law. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access, making corrections or removing your information. You can also opt-out of targeted advertisements through the Services by emailing us at admin@okty.app. In addition, you may email us at admin@okty.app to have your account and PII deleted at any time.

8. How We Store and Protect Your Information.

A. After receiving your PII, we will store it on our servers for future use. We have physical, electronic, and managerial procedures in place to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect. Unfortunately, no data transmission over the internet or data storage solution can ever be completely secure. As a result, although we take industry-standard steps to protect your information (e.g., strong encryption), we cannot ensure or warrant the security of any information you transmit to or receive from us or that we store on our or our service providers' systems.

B. If you are accessing the Service from outside of the USA, you understand that your connection will be through and to servers located in the USA, and the information you provide will be securely stored in our servers and internal systems located within the USA.

C. We store your PII until the earlier of (i) your PII no longer being necessary for the purposes for which it was being processed; (ii) our deletion of your PII in accordance with our data retention decisions as well as retention and other internal policies; or (iii) your request that we remove it from our servers, except in cases where we have the legal obligation, or authority, and we elect, to maintain that information. We store our logs and other technical records indefinitely.

9. How Do We Use Cookies And Other Network Technologies?

A. To enhance your online experience with us, our web pages may use "cookies." Cookies are text files that our web server may place on your hard disk to store your preferences. Cookies, by themselves, do not tell us your email address or other PII unless you choose to provide this information to us. Once you choose to provide PII, however, this information may be linked to the data stored in the cookie. Certain features of the Services may not function properly without the aid of cookies. OkTY uses session cookies, which are necessary to allow you to seamlessly navigate from one page or area of the Site to another during your visit, and these are normally deleted when you close your web browser. We also use persistent cookies for your convenience so that you can log in faster, your preferences are remembered from visit to visit, and that you have an overall more convenient experience while visiting our Site.

B. Our Service may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). For more information on how Google uses data when you use our Site or Service, please follow this link: <https://policies.google.com/technologies/partner-sites>. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at, <https://tools.google.com/dlpage/gaoptout>. Google may additionally use your information as described here, <https://policies.google.com/technologies/partner-sites?hl=en-US>. You may be able to opt-out of Google's collection and/or use of your information. Please visit Google's [Ads Preferences Manager](#) or the [Google Analytics opt-out browser add-on](#) for more information.

C. We also use the Firebase service from Google in order to derive application behavioral analytics, we use that information to see how users interact with our Site and App. Firebase is part of the Google Cloud Platform and offers a number of services for developers. Some Firebase services process personal data. In most cases, the personal data is limited to so-called "instance IDs", which are provided with a time stamp. These "Instance IDs" assigned by Firebase are unique and thus allow the linking of different events or processes. This data does not represent personally identifiable information for us, nor do we make any efforts to personalize it subsequently. OkTY uses the following Firebase services in our Service:

- Google Analytics for Firebase is used to provide us with analytics and attribution information, and will collect your mobile device advertising identifiers (you can restrict the usage of these identifiers through the settings on your mobile device), which will be discarded after 60 days with other information possibly held for up to 14 months; and
- In-App Messaging is used to transmit push messages or so-called in-app messages (messages that are only displayed within our App). A pseudonymized push reference is assigned to your mobile device, which serves as a target for the push messages or in-app messages. The push messages can be deactivated and reactivated at any time in the settings of the mobile device. Firebase In-App Messaging uses Instance IDs to determine which devices to deliver messages to. Firebase retains Instance IDs until the Firebase customer makes an API call to delete the ID. After the call, data is removed from live and backup systems within 180 days.

D. We or our service providers may also use "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") in connection with some OkTY Site pages and HTML-formatted email messages for purposes of, among other things, compiling aggregate statistics about website usage and response rates. A Pixel Tag is an electronic image, often a single pixel (1x1), that is ordinarily not visible to website visitors and may be associated with cookies on visitors' hard drives. Pixel Tags allow us and our service providers to count users who have visited certain pages of the OkTY Site, to deliver customized services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, Pixel Tags can inform the sender of the email whether and when the email has been opened.

E. As you use the internet, you leave a trail of electronic information at each website you visit. This information, which is sometimes referred to as "clickstream data", can be collected and stored by a website's server. Clickstream data can reveal the type of computer and browsing software you use and the address of the website from which you linked to our Site. We may use clickstream data as a form of non-personally identifiable information to determine how much time visitors spend on each page of our Site, how visitors navigate through the Site, and how we may tailor our web pages to better meet the needs of visitors. We will only use this information to improve our Site, the App, and the Services.

F. Do Not Track. At present, the Service does not specifically respond to browser do-not-track signals, except as to location data and Financial Data.

10. Co-branded Site(s). We may partner with other companies to provide you with content or Services on a joint or "co-branded" basis. On a co-branded site, you will see our logo and you may, or may not, see the logo of the co-branding partner ("Partner") displayed on your screen as well. In the instance of a co-branded site, our Partner will be the entity collecting your information, and will comply with our Privacy Policy with respect to such information.

11. Collection of Information by Others.

For your convenience, our Terms of Service may provide links, and that you may access through our Service, to certain third party websites and services. When you leave our Service, please check the privacy policies of these other websites to learn how they collect, use, store and share information that you may submit to them or that they collect. We are not responsible for the privacy practices of such other sites. This Privacy Policy applies solely to information collected by OkTY through the Service.

12. Children and Young People's Information.

We do not knowingly collect any information from any minors, and we comply with all applicable privacy laws including the Children's Online Privacy Protection Act ("COPPA"), and associated Federal Trade Commission ("FTC") rules for collecting personal information from minors. Please see the FTC's website (www.ftc.gov) for more information. If you have concerns about this Site, wish to find out if your child has accessed our services, or wish to remove your child's personal information from our servers, please contact us at admin@okty.app. Our Site will not knowingly accept personal information from anyone under 13 years old in violation of applicable laws, without consent of a parent or guardian. In the event that we discover that a child under the age of 13 has provided PII to us, we will make efforts to delete the child's information in accordance with the COPPA. If you believe that your child under 13 has gained access to our Site without your permission, please contact us at admin@okty.app.

13. California Privacy Rights.

California law allows California residents to request information regarding our disclosures to third parties in the prior calendar year, if any, of their personally identifiable information. To make such a request, please contact us at admin@okty.app with "Request for Privacy Information" in the subject line. Please include enough detail for us to locate your file; at a minimum, your name, email, and username, if any. We will attempt to provide you with the requested information within thirty (30) days of receipt. We reserve our right not to respond to requests sent more than once in a calendar year, or requests submitted to an address other than the one posted in this notice. Please note that this law does not cover all information sharing. Our disclosure only includes information covered by the law.

14. Our Contact Information

If you have any questions or concerns about this Privacy Policy you may email us at admin@okty.app.

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