

Privacy Policy

The Spony Privacy Policy was updated on April 12, 2019.

Spony has created this Privacy Policy to explain how we collect, use, disclose and protect your information, including any non-public personal information. This policy applies to information we collect when you use our mobile application (hereinafter referred to as “Services”) or otherwise interact with us as described below. Please take a moment to familiarize yourself with our privacy practices and let us know if you have any questions.

Spony (hereinafter referred to as “we” or “us”) reserves the right to change this Privacy Policy from time to time. If we make changes, you will be notified by the date revision at the top of this policy. In some cases, we may provide you with additional notice (e.g. by adding a statement to the homepage of our mobile application or by sending you an email notification). We encourage you to review the Privacy Policy whenever you interact with us to stay informed about our information practices and the ways you can help protect and control your privacy.

Collection of Information

Personal information is data that can be used to identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with Spony or a Spony affiliated company. Spony and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Categories of Non-Public Personal Information

Information You Provide to Us

We collect non-public personal information you provide to us when you apply for a Spony account or when you communicate with us about your Spony account. The types of information we may collect include (but are not restricted to) your name, address, phone number, email address, username, password, and any other information you choose to provide.

Information From Other Sources

When you create a Spony account, we may collect information, including non-public personal information, about you from non-affiliated third party service providers, including your prior addresses and names, in order to verify your identity and for fraud prevention purposes.

Other Information We Collect

Other information we may collect from you, that is not connected with a Spony account, include as follows:

Information You Provide to Us

We may collect information you provide to us, such as your name, email address and any other information you choose to provide. For example, we may collect such information if you request an invite to join Spony or if you enter into any contest or promotion.

Information We Automatically Collect from our Services

When you access or use our Services, we automatically collect information about you as follows:

- **Log Information:** We log information about your use of our Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Location Information:** We may collect your location information from your mobile device with your prior consent. Also, we have incorporated Google Maps into our Services, and you may consent to the collection of location information by Google Maps in connection with your use of this maps service. Any information collected via your use of Google Maps will be transmitted directly to Google and is not collected by us. Please refer to Google's [privacy policy](#) for details about their collection, use and sharing of this information. For information about how to disable collecting location information from your device, please see "Your Choices" below.

- **Use of Information**

We may use your information, including non-public personal information, in order to:

- Provide, maintain and improve our Services;
- Provide and deliver the products and services you request, process transactions and send you related information, including confirmations;

- Verify your identity and prevent fraud;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;
- Communicate with you about products, services, offers, promotions, rewards, and events offered by Spony and others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage patterns and activities in connection with our Services;
- Personalize and improve the Services and provide advertisements, content or features that match user profiles or interests;
- Process and deliver contest or promotion entries and rewards;
- Link or combine with information we get from others to help better understand your needs and provide you with an improved service, and
- Carry out any other purpose for which the information was collected.

Spony is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

Disclosure of Information to Third Parties

We may disclose any information we collect about current and former customers, including non-public personal information, to affiliates and non-affiliated third parties as follows:

(1) With another user, when you sign up for Spony's services via a referral link. The user that referred you may receive information indicating that you have enrolled with Spony. You may avoid this by not using a referral link to enroll;

(2) With another user, when you sign up for a Spony Shared Account with that user;

We may also share aggregated or de-identified Information, which cannot reasonably be used to identify you. For example, we may share transaction zip codes and merchant names with third parties to improve our accuracy in geo-locating transactions and to improve the clarity of transaction descriptions.

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for Spony to disclose your personal information. We may also disclose information about you if we determine that for

purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

Integrity and Retention of Personal Information

Spony makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Your Choices

Account Information

You may edit your account profile information by logging into your account via our Services. If you wish to delete or deactivate your online account, please [contact us](#), but note that we may retain certain information as required by law or for legitimate business purposes.

Promotional Communications

You may opt out of receiving promotional emails and text messages from Spony by following the instructions in those messages. Please note that if you opt out, we may still send you transactional or business-related messages, such as those about your account or our ongoing business relations.

Location Information

If you initially consent to the collection of location information by Spony or Google Maps within our mobile application, you may be able to subsequently stop this collection through your device operating system settings or through your online account settings. If either of these opt-out options are not available to you, you may also disable location information by following the standard uninstall process to remove our mobile application from your device.

Social Sharing Features

Our Services include social sharing features for common social networks to let users share content. These features are served from third-party services that may serve their own cookies. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

Security

Spony takes reasonable measures to help protect all information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. Additionally, Spony implements policies designed to protect the confidentiality and security of your non-public personal information, including a privacy protection policy for Social Security numbers. Spony limits access to your non-public personal information to employees that have a business reason to know such information, and implements security practices and procedures designed to protect the confidentiality and security of such information and prohibit unlawful disclosure of such information in accordance with its policies.

Our Companywide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to Spony employees and strictly enforce privacy safeguards within the company.

Privacy Questions

If you have any questions or concerns about Spony's Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us.

All such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.