

PRIVACY POLICY

At FindWhere, we are committed to protecting your privacy and to developing technology that gives you the most powerful and secure online experience. You can travel through most of our site without giving us any information about yourself. But sometimes we do need information to provide services that you request, and this statement of privacy explains data collection and use in those situations.

WHO WE ARE

FindWhere is a FindWhere Holding Inc owned brand. FindWhere Holding Inc is registered in Delaware, USA and operates globally through resellers and dealers. This document sets out the privacy policy of FindWhere. This policy explains how FindWhere and its affiliated companies ("we", "us", "our") use your personal information (meaning any information about you which is personally identifiable like your name, address, telephone number or email address and is generally referred to throughout this policy as "your information"). It applies to personal information collected from you.

HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

We collect your information firstly, when you give it to us (for example, when you register for our services using our registration services). In general, we use the information you provide to us in order to enable you to use our applications and services, to process requests, to enter you for promotions which you have indicated you wish to enter, to identify your personal preferences and to match your needs with relevant services or products. The information you provide to us via online registration is used to provide you with access via your user name and password to our website, to sign up and to receive newsletters.

INFORMATION SHARING AND DISCLOSURE

In addition and with your consent we (and if applicable, our partners or other trusted third parties) use your information for certain marketing, market research, analysis and related purposes. It is up to you how much or how little information you allow us to use for these purposes. Our on screen notices will generally ask for your explicit permission to contact you for such additional purposes. These are:

- to communicate with you from time to time by email and (where you provide us with those details either via the website or elsewhere) by mobile (using SMS or, if your mobile device permits, EMS or MMS messages or similar technologies) and occasionally by post, with information, offers and other material which may interest you;
- to make your information available from time to time to trusted partners and third parties, for the same purposes as above;
- to conduct market research, for example to ask you to participate in a survey about topical issues, conducted by us or trusted partners or third parties. We will always try to tell you before you participate in the survey how any information you provide in the survey will be used;
- to enable us and third parties acting on our behalf to analyze your information, in a non identifying form, (generally in the form of statistics), so that we can identify trends about usage of our website(s) or services and improve them.

Additionally we reserve the right to access and disclose your personal information in order to comply with applicable laws, to comply with lawful requests from governments, law enforcement agencies or parties whose request we reasonably consider to be justified in connection with any allegations by any party about your abuse of our services, to operate our systems properly or to protect ourselves or our users.

Information We Collect From You

In order to operate the Website and to provide you with information about products or services that may be of interest to you, we may collect "personal information" (i.e. information that could be used to contact you directly (without using the Website) such as full name, postal address, phone number or email address), "financial information" (i.e. credit card numbers or passwords), or "demographic information" (i.e. information that you submit, or that we collect, that is not personal information or financial information; this may include, but is not limited to, zip code, postal code, hometown, gender, username, age/birth date, purchase history information, browsing history information, searching history information, registration history information, "position information" (i.e. geographic coordinates, GSM cell-id), "status information" (i.e. presence, preferred communication channel) and the content of communications between you and other members over the Website), subject to the rest of this paragraph. Demographic information is divided into two categories: 1) "non-public information", which consists of purchase history information and one-on-one communications between you and other users of the Website; and 2) "public information", which consists of all other demographic information. We ask that you do not enter personal information or financial information into your "Profile" (for example, don't use your address or password as your username, or include your name or address in your written responses), because if you do then it may be posted publicly on the Website, and the information will then be treated as "demographic information" that is "public information." Please note that nowhere on the Website do we knowingly collect personal information from children under the age of 18, as we require that all users represent to us that they are at least 18 years old.

Information Other Websites Collect From You

On the Site, we place links to other Websites operated by other parties. Some of these other Websites contain our brand names and trademarks and other intellectual property that we own; others do not. When you click on these links and visit these other Websites, regardless of whether or not they contain our brand names, trademarks and other intellectual property, you need to be aware that we do not control these other Websites or these other Websites' business practices, and that this privacy policy does not apply to these other Websites. Consequently, the operators of these other Websites may collect different kinds of information about you, and may use and disclose that information in different ways than we would if it were collected on the Site. We encourage you to review their privacy policies and remind you that we will not be responsible for their actions.

How We Use Personal Information

We use your email address and your other personal information to help us efficiently operate the Site, to contact you in connection with your transactions and other activities on the Website (including, but not limited to, confirmation emails or important news that could affect your relationship with FindWhere, and to forward messages including messages containing status, preferences and position information to you from other FindWhere members. Moreover, position information containing GPS coordinates and information from your Telecom Operator (GSM cell-id, name of Telecom Operator, etc.) will be collected by the Website for enrichment of the LBS (Location Based Server) / Website. These types of communications are known as "Operational Communications." In some cases, Operational Communications may also contain commercial messages, such as banner ads and special offers.

We also use personal information to send you newsletters, information, offers and other promotional materials for FindWhere or third parties' goods or services. We attempt to send you offers that are of value to you, such as discounts, exclusive offers or special event information.

To operate the Website, including processing your transactions and supporting your activities on the Website, we may share your personal information with our agents, representatives, contractors and service providers so they can provide us with support services such as authorization of credit card transactions, email origination, receipt or support services, customer relationship management services, order fulfillment and sweepstakes and promotional fulfillment. We require these entities not to use your information for any other purpose.

By purchasing, or registering or making reservations for, products or services offered or sponsored by third parties on the Website, or electing to receive communications (such as emails or magazine subscriptions) or electing to participate in contests, sweepstakes or other programs (such as discount or rewards programs), offered or sponsored by third parties on the Website, you consent to our providing your personal information to those third parties. Those third parties may use your personal information in accordance with their own privacy policies. You will need to contact those third parties to instruct them directly regarding your preferences for the use of your personal information by them. Additionally, you agree that we may use and disclose all such information so submitted to such third parties in the same manner in which we are entitled to use and disclose any other information you submit to us.

In some cases, we may enter into a promotional relationship with another company in which we prominently display their brand name or trademarks on pages of the Website. These pages are known as "Co-Branded Pages" and these companies are known as "Co-Branded Companies." If the page on which you submit information is a Co-Branded Page, or was accessed by clicking on a link on a Co-Branded Page, then we may share your personal information with the associated Co-Branded Company. Co-Branded Companies may use your personal information in accordance with their own privacy policies. You will need to contact Co-Branded Companies to instruct them directly regarding your preferences for the use of your personal information by them. Additionally, you agree that we may use and disclose all such information so submitted to such Co-Branded Companies in the same manner in which we are entitled to use and disclose any other information you submit to us. Some Co-Branded Pages may contain an action tag (also known as a Web Beacon or a 1 pixel .gif file) that a third party, such as the advertising company Avenue A, may use to read cookies that it, or its clients, may have placed on your browser at other (non-FindWhere) web sites before your visit to FindWhere. This technology is used to measure the effectiveness of advertisements on such other Websites that promote Co-Branded Pages.

Any third party with whom we are allowed to share your personal information is authorized to use your personal information in accordance with our contractual arrangements with such third parties and in accordance with their own privacy policies, over which we have no control, and you agree that we are not responsible or liable for any of their actions or omissions. Those who contact you will need to be instructed directly by you regarding your preferences for the use of your personal information by them.

Please read the information below under the heading "Special Cases in which we Share Personal and Financial Information" to learn more ways in which we may share your personal information.

How We Use Financial Information

We use your financial information to check your qualifications, to bill you for products and services and to enable you to participate in discount, rebate and similar programs in which you may elect to participate. By making a purchase, or engaging in any other kind of activity or transaction that uses financial information, on the Website, you consent to our providing your financial information to our service providers and to such third parties as we determine are necessary to support and process your activities and transactions, as well as to your credit card issuer for their purposes. These third parties may include the credit card companies and banking institutions used to process and support the transaction or activity. By purchasing, or registering or making reservations for, products or services of third parties offered on the Website, or by participating in programs offered on the Website that are administered by third parties and that require you to submit financial information in order to use them, you also consent to our providing your financial information to those third parties. Additionally, if the page on which you submit information is a Co-Branded Page, or was accessed by clicking on a link on a Co-Branded Page, then we may share your financial information with the associated Co-Branded Company. Any of these various third parties (including Co-Branded Companies) may be authorized to use your financial information in accordance with our contractual arrangements with such third parties and in accordance with their own privacy policies, over which we have no control, and you agree that we are not responsible or liable for any of their actions or omissions. Additionally, you agree that we may use and disclose all such information so submitted to such third parties in the same manner in which we are entitled to use and disclose any other information that you submit to us. Please read the information below under the heading "Special Cases in which we Share Personal and Financial Information" to learn more ways in which we may share your financial information.

Special Cases in which we Share Personal and Financial Information

Your personal information or financial information may be passed on to a third party in the event of a transfer of ownership or assets, or a bankruptcy. We may also disclose personal information or financial information when we determine that such disclosure is necessary to comply with applicable law, to cooperate with law enforcement or to protect the interests or safety of FindWhere or other visitors to the Website. We also may disclose your personal information or financial information to our subsidiary and parent companies and businesses, and other affiliated legal entities and businesses with whom we are under common corporate control. Whenever personal information or financial information is disclosed under this paragraph, we may also disclose your demographic information along with it, on a non-anonymous basis. All of our parent, subsidiary and affiliated legal entities and businesses that receive your personal information, financial information, or non-anonymous demographic information from us will comply with the terms of this privacy policy with respect to their use and disclosure of such information.

How We Use Public Information and Other Demographic Information

We may review all demographic information. We may use public information to enable other users to find your profile, to determine whether they are a match for you and to communicate with you. We may use demographic information to tailor the Website and communications to your interests. We may also share demographic information with advertisers on an anonymous and aggregated basis (i.e., without telling the advertisers your identity). One of the reasons we may do this is to increase the likelihood that our advertisers' goods and services will appeal to FindWhere users, so that we may target specific ads at specific demographic groups. Our sharing of demographic information with advertisers is anonymous (i.e., we do not tell advertisers which particular FindWhere users are members of which demographic groups), subject to the rest of this privacy policy. When you respond to an advertisement, however, we ask you to remember that if that ad that is targeted to a demographic group and you decide to give the advertiser your personal information, then the advertiser may be able to identify you as being a member of that demographic group. Please also be aware that when we disclose your financial information or personal information to a Co-Branded Company, as described above, we may also disclose to that Co-Branded Company your demographic information, other than the content of one-on-one communications between you and other members. Please also be aware that we may disclose your demographic information on a non-anonymous basis as described above in the paragraph titled "Special Cases in which we Share Personal and Financial Information." Also, to read further details about how we may use your public information, see our

The external suppliers of Maps and Address data in some cases may keep track off requests submitted to the applications. This information does not contain the customers name or contact information. The customer is responsible for controlling the mobile device and FindWhere can not be held responsible if the mobile device is used for illegal purposes or does not have the end-users permission for usage.

AUTOMATIC INFORMATION

FindWhere web sites use "cookies" to enable you to sign in our services and to help personalize your online experience. Cookies are small text files saved to your computer and used to track user navigation around the website. Examples of the information that we collect and analyze using cookies include log-in; email address; password; the internet protocol (IP) address used to connect your computer to the internet; browser type and version; operating system and platform you use to connect; cookie number; areas of the website(s) you viewed or searched for; the Uniform Resource Locators (URLs) from or through which you visited our website(s) and from which you left it, including date and time. You can use the "Help" section of the tool bar on most browsers to change the settings on your computer, for example to notify you when you

receive a cookie, or to refuse all cookies. However, some of the features of our website(s) may not work if you refuse all cookies.

We may use a third party advertising company to serve ads when you visit our website(s). This company may use information (not including your name, address, email address or telephone number) about your visit to the website(s) in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to the website(s), our third party advertiser may place or recognize a unique "cookie" on your browser.

UNSUBSCRIBING/AMENDING YOUR INFORMATION

You can amend or remove information you give us via our website(s) at any time. You can remove your information from our database entirely by sending an email to support@FindWhere.com specifying your name, the email address/ mobile phone number you used to register with us and if referring to a web registration, your user name in the email. If you only want to remove your information from our server, newsletter or other interaction with us, simply send an email to us at support@FindWhere.com with the information above.

Alternatively, whenever we contact you, (for example to send you an email newsletter which you have requested) you will normally find an email address at the bottom of the email, which you can use to tell us if you no longer wish to receive the newsletter or other communication in question. You can amend or update your information or personal preferences at any time, or raise comments or questions about privacy issues, by sending an email to support@FindWhere.com.

SECURITY

FindWhere is committed to protecting the security of your personal information. We have taken steps to ensure that your information is secure, including limiting the number of people who have physical access to our database servers, as well as electronic security systems and password protections that guard against unauthorized access. You agree that, except for death and personal injury arising exclusively from indispensable (read: "but for"- rule) intentional act (excluding negligence) on the part of FindWhere we shall not be liable in contract, tort, negligence, statutory duty or otherwise, for any loss or damage whatsoever arising from or in any way connected with this contract or the use or performance of the Service or related Website, including and without limitation, damage for loss of business, loss of profits, business interruption, loss of business information, or any other pecuniary loss even where we have been advised of the possibility of such loss or damage. In the event for whatever reason any (of these) liability(ies) should occur FindWhere liability will be limited to the maximum of \$ 500,- or the equivalent of this amount in Euro.

If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. Do not share this information with anyone. If you are sharing a computer with anyone you should always choose to log out before leaving a site or service to protect access to your information from subsequent users.

BUSINESS TRANSFERS

When we and/or our merchant providers transmit highly confidential information (such as a credit card number or password) over the internet, we and/or our merchant providers protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol. In the unlikely event that we sell or otherwise dispose of some or all of our business to another party, we reserve the right to transfer your information as part of any assets sold or disposed of. By accepting these Terms and Conditions you allow us to transfer your information as part of any assets sold or disposed of.

CHANGES TO OUR PRIVACY POLICY

We will occasionally update this privacy statement to reflect changes in our services and customer feedback. When we post changes to this statement, we will revise the "last updated" date at the bottom of this statement. Further we will try to email you if there are any changes to this policy that materially affect how we use your information. However, we encourage users to be responsible about their privacy and to check this policy from time to time and to update their preferences.

This Privacy Policy Terms was last updated in May, 2009