

# Privacy Policy

This section explains the information we collect, use, and share:

## Information Collection and Use:

Twitmore is a Twitter client and as such it needs to make many requests to Twitter's service. Twitmore collects your Twitter user ID, Twitter password, and your tweets to connect Twitmore to your Twitter account. Twitmore will ask you for your consent to use any device peripherals (e.g. microphone, camera, gps). Please read Twitter's privacy policy for more details on what they may do with data.

Twitmore also contains the VRTCAL SDK which is used for delivering advertising. The VRTCAL SDK may collect certain device information, including the following:

- Device make, model, and operating system;
- Device properties related to screen size, orientation, audio, battery, device memory usage, settings, and boot time;
- Device settings related to accessibility features, font size, and theme;
- Device sensor information such as accelerometer, barometer, or other similar sensor measurements;
- Carrier;
- Operating system;
- Name and properties of mobile applications through which a consumer interacts with the Services;
- Country, time zone, and locale settings (country and preferred language);
- City and/or country-level or other geolocation data;
- Network connection type and speed;
- IP Address;
- Internet browser user-agent used to access the Services;
- HTTP header information;
- Advertising IDs (IDFA/GAID/Amazon FOSAID);
- Vendor IDs (IDFV); and
- Advertising and tracking preferences and restrictions.

We do not collect names, physical addresses, government issued identifiers (e.g. driver license, social, security number), financial information, place of employment or other information which could be linked to a specific person or household, with the exception of login information required by Twitter (e.g. email, phone).

We do not collect any "sensitive" or "special categories of personal data" as defined under European data protection laws.

### **Information Sharing:**

VRTCAL SDK shares the above device information with the following:

- Advertising Buyers: We share your device information with our advertisers to help them identify and buy advertising on Twitmore. Advertisers may use this information in conjunction with other information they have independently collected to provide you targeted advertising and to help them evaluate whether a particular ad campaign may be of interest to you.
- Vendors, partners and other service providers: We may share device information to our vendors and partners who perform functions on our or our publishers' behalf and require access to such information to provide us with services, advertising support, or do work for us. Examples include: analyzing data, supporting advertising, fraud prevention, hosting data, engaging technical support for our technology platform, and performing analysis related to our technology platform and related services.

### Information Our Advertisers and Vendors Use

Our advertisers, our vendors, and our advertisers' vendors, who use our technology may use their own tags, pixels or other similar technology (or those of their other affiliates) within their advertisements and on certain Digital Media Properties like Twitmore. We are not responsible for our advertisers, vendors and/or our advertiser's vendor use of such tracking technologies or for their privacy practices.

### Data Retention

We never store any device information longer than we need it and we do not store personal information. We store aforementioned data for up to 90 days before we aggregate that data into summary reports.

### Manage Your Privacy

You may also limit the collection of information from mobile apps on your device for interest-based advertising us by adjusting the settings on your mobile device.

For iOS mobile devices, go to "Settings" from your Device's home screen; scroll down to "Privacy"; select "Advertising"; and turn on "Limit Ad Tracking."

For Android mobile devices, go to "Google Settings" on your Device; select "Ads"; and check the box labeled "Opt-Out of Interest-Based Ads."

Please note that if you exercise choice, you may still receive ads, but those ads may be less relevant to your interests. If you reset your device identifier, you may need to make your choices again.

### Children Under the Age of 16

Our Products are not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [info@vrtcal.com](mailto:info@vrtcal.com).

### European Data Subject Rights

If you are a resident of a country in the European Economic Area (“EEA”), you have certain rights and protections under the law regarding the collection, processing, and use of information about you. As stated above, the information that we share about you when you may include certain digital identifiers that are considered “personal data” under European law. We process this data as it is necessary to further the legitimate interests of our publisher Twitmore, who rely on the ability to deliver you and other users with advertisements (including targeted advertisements) in order to fund the content they deliver to you. As a resident of a country in the EEA, you have the right: (i) to request access and obtain a copy of your User Information, (ii) to request rectification or erasure; (iii) to restrict the processing of your User Information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your User Information.

If you would like to exercise this right, please see our Subject Access Request policy for instructions on how to do so: <https://vrtcal.com/docs/subject-access-request-policy.pdf>. Please note that because most of the information we receive can only identify a particular browser or device, and cannot identify you individually, we require you to provide us with some additional information to ensure that we provide you with accurate information.

### California Resident Rights – CCPA

If you are a resident of the State of California, you have the right to know what type of Personal Information we process, the categories of sources from which we obtain Personal Information, and the third parties with whom we share Personal Information which are described in Section A “Information We Receive.” You also have the right to request what information we process and how we use and disclose it. If you would like to exercise this right, please see our Subject Access Request Policy for instructions on how to do so: <https://vrtcal.com/docs/subject-access-request-policy.pdf>. Please note that because most of the information we receive can only identify a particular browser or device, and cannot identify you individually, we require you to provide us with some additional information to ensure that we provide you with accurate information.

### Do Not Sell My Personal Information

VRTCAL does not sell your Personal Information. Advertising Buyers may use our technology to buy or sell Personal Information as defined by California Law. If you wish to opt-out of use of Personal Information for interest-based advertising purposes, you may do so by following instructions in the section above: “Manage Your Privacy.” Note that because the opt-outs are specific to the device or browser on which they are exercised, you will need to opt-out on each browser and device.

## Security

We use industry-standard technical and organizational security measures to help protect information transmitted over or stored on our systems. Please note that no transmission or storage of information, however, can never be guaranteed to be completely secured, though we take all reasonable precautions to protect against security incidents.

## Changes to this Policy

This Privacy Policy may be amended or updated from time to time. You are advised to consult this Privacy Policy regularly for any changes.

## Contact Us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact VRTCAL by e-mail at [info@vrtcal.com](mailto:info@vrtcal.com) or by post using the details provided below:

VRTCAL Markets, Inc.  
Attn: Privacy Officer  
351 Paseo Nuevo  
Santa Barbara, CA 93101