

Privacy Policy

Effective as of July 5, 2018.

This “Privacy Policy” describes the privacy practices of MovingParts Inc. d/b/a Pivt and our subsidiaries and affiliates (collectively, “Pivt”, “we”, “us”, or “our”). This Privacy Policy describes how we collect, use, disclose and otherwise process personal information in connection with our websites, mobile apps, and other services, and explains the rights and choices available to individuals with respect to their information. For convenience, our websites and mobile apps are collectively referred to as the “Sites,” and, together with our other services, collectively referred to as the “Services.” This Privacy Policy governs any of the Services on which the Privacy Policy is posted.

We provide important information for individuals located in the European Union here.

[Personal Information We Collect](#)

[Cookies and Similar Technologies](#)

[How We Use Your Personal Information](#)

[How We Share your Personal Information](#)

[Your Choices](#)

[Security](#)

[Children](#)

[Sensitive Personal Information](#)

[International Transfer](#)

[Other Sites and Services](#)

[User Generated Content](#)

[Changes to this Privacy Policy](#)

[Contact Us](#)

[Additional Information for European Union Users](#)

Personal Information We Collect

Information you give us

Personal information that you may provide through the Services or otherwise communicate with us, including by connecting to our Services using your Facebook account, includes:

- **Contact information**, such as your first name, last name, and email address
- **Profile information**, such as your Facebook username, user ID, profile picture, cover photo, and networks to which you belong (e.g., school, workplace); and information about your interests and preferences
- **Demographic details**, such as your age range, language, country, and gender
- **Other information that you may choose to authorize us to obtain from Facebook**, such as your birthday, friends list, hometown, current city, and email address
- **Personal information that may be contained in user generated content that you choose to submit to us**, as further described in the User Generated Content section
- **Feedback and correspondence**, such as information you provide when you report a problem with the Services, receive customer support, or otherwise correspond with us
- **Transaction information**, such as billing information and details about purchases you make through the Sites, and information you provide when you enter into one of our contests or other promotions
- **Usage information**, such as information about how you use the Services and interact with us, including information associated with any content you upload to the Sites or otherwise submit to us through the Services, and information you provide when you use any interactive features of the Services
- **Precise geolocation information**, if you authorize our mobile application to access your location
- **Marketing information**, such your preferences for receiving marketing communications and details about how you engage with marketing communications

Information we collect from other users

We collect information that other users of the Services may provide about you, such as the fact that you may be a Facebook friend of another user. Users are able to interact with each other through the Services, and a user may provide personal information about another user through such interactions, including by recommending that other users interact through the Services.

Referrals

Existing users of our Services may have the opportunity to refer friends or other contacts to us. If you are an existing users, you may only submit a referral if you have permission to provide the referral's contact information to us.

Information automatically collected

When you access our Sites, we, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity on our Sites. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier, browser type, screen resolution, IP address, the website you visited before browsing to our Sites, general location information such as city, state or geographic area; and information about your use of and actions on our Sites, such as pages you viewed, how long you spent on a page, navigation paths between pages, information about your activity on a page, access times, and length of access. This information is collected using cookies and similar technologies. Please refer to the Cookies and Similar Technologies section for more details.

Cookies and Similar Technologies

What are cookies?

Cookies are small data files stored on your computer or mobile device by a website. Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Site; and (2) third party cookies, which are served by service providers or business partners on our Site, and can be used by such service providers or business partners to recognise your computer or mobile device when it visits other websites.

Cookies we use

Our Site uses the following types of cookies for the purposes set out below:

Type of cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
<i>Functionality Cookies</i>	These cookies allow our Site to remember choices you make when you use our Site. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-select your preferences every time you visit our Site.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered may include the types of information described above in the section titled “Information automatically collected.” We use this information to help operate our Site more efficiently, to gather broad demographic information, monitor the level of activity on our Site, and improve the Site.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available here. In our mobile application, we use Google Analytics for Firebase for analytics and performance purposes.</p>
<i>Social Media Cookies</i>	These cookies are used when you share information using a social media sharing button or “like” (or similar) button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter. The social network will record that you have done this.

<p><i>Targeted and advertising cookies</i></p>	<p>These cookies track your browsing habits to enable us and third-party advertising networks to deliver ads that may be of interest to you. These cookies use information about your browsing history to group you with other users who have similar interests or browsing behavior. Based on the cookies that the third-party advertising network sets on our Site and other sites, advertisers can display advertisements that may be relevant to your interests on our Site and while you are on third party websites.</p> <p>You can choose to disable cookies, as described below, or to opt out of the use of your browsing behaviour for purposes of targeted advertising. Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking here or the Digital Advertising Alliance by clicking here. European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking here, selecting the user's country, and then clicking "Choices" (or similarly-titled link). Mobile app users may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available here, and selecting the user's choices. If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioural advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.</p>
--	--

Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the "settings," "help" "tools" or "edit" menus). Many browsers are set to accept cookies until you change your settings.

For further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

Flash Technology

We may use Flash cookies (which are also known as Flash Local Shared Object ("LSOs")) on our Site to collect and store information about your use of our Site. Unlike other cookies, Flash cookies cannot be removed or rejected via your browser settings. If you do not want Flash cookies stored on your computer or mobile device, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel at [this website](#). You can also control Flash LSOs by going to the Global Storage Settings Panel at [this website](#) and following the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our Site

Pixel tags

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site to track the actions of users on our Site. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Site, so that we can manage our content more effectively.

Do Not Track Signals

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not currently respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

How We Use Your Personal Information

To provide our Services

If you have a Pivt account or use our Services, we use your personal information to:

- operate, maintain, administer and improve the Services
- enable you to login to the Services using third-party authentication providers, such as Facebook
- manage and communicate with you regarding your Pivt account, if you have one, including by sending you service announcements, technical notices, updates, security alerts, and support and administrative messages
- process and manage purchases and registrations you make through the Sites, including to administer contests and other promotions
- manage individual referrals
- better understand your needs and interests, and personalize your experience with the Sites
- provide support and maintenance for the Services
- respond to your service-related requests, questions and feedback

To communicate with you

If you request information from us (such as signing up for our newsletter), register on the Sites, or participate in our contests or promotions, we may send you Pivt-related marketing communications as permitted by law. You will have the ability to opt out of such communications.

To comply with law

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent

We will request your consent to use your personal information where required by law, such as where we use certain cookies or similar technologies or would like to send you certain marketing messages. If we request your consent to use your personal information, you have the right to withdraw your consent any time in the manner indicated when we requested the consent or by contacting us. If you have consented to receive

marketing communications from our third party partners, you may withdraw your consent by contacting those partners directly.

To create anonymous data for analytics

We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by excluding information that makes the data personally identifiable to you, and use that anonymous data for our lawful business purposes.

For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Service; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

How We Share your Personal Information

Affiliates

We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

Users of the Services/Visitors to the Sites

Content you submit to the Sites or through the Services may be viewable by other users of the Services. For example, other users may be able to see content you post through the services, such as public posts, reviews, and recommendations, and your name may be associated with your content. Please refer to the section on User Generated Content for additional details. If you participate in a Pivt contest or promotion, we may share contestant names as disclosed in the terms of the contest or promotion, including by posting the winner's name on our Sites.

Business partners

We may disclose your personal information to our business partners for their own business purposes, to the extent such disclosure is permitted by law. You may opt-out of our sharing personal information with business partners for their direct marketing purposes by contacting us at privacy@Pivtapp.com.

Service Providers

We may employ third party companies and individuals to administer and provide the Services on our behalf (such as customer support, hosting, email delivery and database management services). These third parties may use your information only as directed by Company and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Professional advisors

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Compliance with Laws and Law Enforcement; Protection and Safety

Company may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Service; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Business Transfers

Company may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

Your Choices

Access, Update, Correct or Delete Your Information

All Pivt account holders may review, update, correct or delete the personal information in their registration profile by logging into their account. You may also contact us at privacy@Pivtapp.com to access, update or correct the personal information Pivt maintains about you, or if you have additional requests or questions.

Marketing communications

You may opt out of marketing-related emails by logging in and changing your account settings, by clicking on a link at the bottom of each such email, or by contacting us at privacy@Pivtapp.com. You may continue to receive service-related and other non-marketing emails.

Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

Security

The security of your personal information important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it. However, no security safeguards are 100% secure and we cannot guarantee the security of your information.

Children

Our Sites are not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable.

Sensitive Personal Information

We ask that you not send us, and you not disclose, any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on the Sites, through the Services, or otherwise to us.

If you send or disclose any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.

International Transfer

Pivt is headquartered in the United States and has service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

European Union users should read the important information provided here about transfer of personal information outside of the European Economic Area.

Other Sites and Services

The Sites may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services, and are not responsible for their actions. Other websites and services may follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

User Generated Content

We may make available on our Sites, or link to, features that allow you to generate your own content or share information online (e.g., on message boards, in chat areas, via functionality that enables file uploads, etc.). Please do not embed personal information in the content you generate or share personal information online in public or community forums. Whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage, dissemination or erasure of personal information embedded in user-generated content or shared publicly, except to the extent required by applicable law. By posting personal information online in public or community forums, you may receive unsolicited messages from other parties.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Sites and in the app stores where our mobile application is available for download. We may (and, where required by law, will) also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service (which may include posting an announcement on or within the Sites).

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

Contact Us

If you have any questions or concerns at all about our Privacy Policy, please feel free to email us at privacy@Pivtapp.com.

Additional Information for European Union Users

Personal information

References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller

MovingParts Inc. d/b/a Pivt is the controller of your personal information for purposes of European data protection legislation. See the Contact Us section above for contact details.

Legal bases for processing

We use your personal information only as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at privacy@Pivtapp.com.

Processing purpose (click link for details)	Legal basis
To provide the Services	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services.
To communicate with you To create anonymous data for analytics	These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests.

For compliance, fraud prevention and safety	We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
To comply with law	Processing is necessary to comply with our legal obligations
With your consent Business partners	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at privacy@Pivtapp.com .

Use for new purposes

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have otherwise collected about you, we will dissociate such information from the information attached to your content. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you), in which case we may use this information indefinitely without further notice to you.

Your rights

European data protection laws give European Union users certain rights regarding their personal information. If you are located within the European Union, you may ask us to take the following actions in relation to your personal information that we hold:

- **Opt-out.** Stop sending you direct marketing communications. You may continue to receive service-related and other non-marketing emails.
- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information.

You can submit these requests by email to privacy@Pivtapp.com or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us as described above or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based:

- Pursuant to the recipient's compliance with standard contractual clauses, EU-US Privacy Shield, or Binding Corporate Rules
- Pursuant to the consent of the individual to whom the personal information pertains
- As otherwise permitted by applicable EEA requirements.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.