Privacy Policy

Effective as of October 1, 2022

This privacy policy (the “Privacy Policy”) applies to the PATH-NOW mobile application (the “App”), owned and operated by ADJOIN (jointly referred to as “we,” “us,” or “our”) and to our websites and associated subdomains, (collectively, the “Website”). We have created this Privacy Policy to tell you what information the App and Website collect, how we use that information, and who we will share that information with, if at all. This Privacy Policy does not address the privacy practices of any third parties that we do not own, control, or are affiliated with. Capitalized terms not defined in this Privacy Policy will have the meaning set forth in our Terms of Use. By visiting and/or using our App or Website, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. We encourage you to read the Privacy Policy and the Terms of Use, and to use the information it contains to help you make informed decisions.

1. Information We Collect or Receive. When you use our APP or visit our Website, we may collect certain information automatically from your device. In some countries, including in the European Economic Area, this information may be considered personal data under applicable data protection laws: By operating or accessing our App and/or Website, you authorize us to collect and/or receive the following types of information:
	1. Personal Information. We only receive or collect information that identifies you personally if you choose to provide such personally identifiable information to us via email or other means. When you sign up to become a user or contact us, you will be required to provide us with personal information about yourself (collectively, the “Personal Information”). Such Personal Information may include your name, age, business name, e-mail address, physical address, phone number, and other Personal Information that you decide to share. We do not collect any Personal Information from you when you use the App unless you provide us with the Personal Information voluntarily.
	2. Third-party Log In. If you sign in through the App, you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you provide to third-party software through their Application Programming Interface (“API”). An API acts as an intermediary layer that processes data transfers between systems and sits between an application and the web server. Such information may include, without limitation, your first and last name, username, profile picture, headline, unique identifier and access token, password, and e-mail address.
	3. Payment Information. If you choose to make a purchase or subscribe to a feature or service of ours that requires a fee, you will be required to provide us with your payment information, including, without limitation, bank account numbers, credit card or debit card numbers, account details, ACH information, and similar data (collectively, “Payment Information”). Such Payment Information will be collected and processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use, and we do not obtain access to any Payment Information in connection with such purchases or subscriptions.
	4. Geolocational Information. Certain features and functionalities of the App are based on your location. In order to provide these features and functionalities while you are using your mobile device, we may, with your consent, automatically collect geolocational information from your mobile device or wireless carrier and/or certain third-party service providers (collectively, “Geolocational Information”). Collection of such Geolocational Information occurs only when the App is running on your device. You may decline to allow us to collect such Geolocational Information, in which case we will not be able to provide certain features or functionalities to you.
	5. Third-Party Analytics. We and the third-party technology providers, ad networks, advertisers, agencies, ad exchanges, and ad servers with which we work use third-party analytics services (e.g., Google Analytics) to evaluate your use of the App and/or Website, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the App and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please refer to Section 4 below. Please be advised that if you opt out of any such service, you may not be able to use the full functionality of the App or Website.
	6. Other Information. In addition to the Personal Information, Payment Information, and Geolocational Information, we may automatically collect or receive additional information regarding you and your use of the App and/or Website; your interactions with us and our advertising; and information regarding your computer and mobile devices used to access the App and/or Website (collectively, the “Other Information”). Such Other Information may include:
		1. From You. Additional information about yourself that you voluntarily provide to us, such as your gender and your product and service preferences.
		2. From Your Activity. We may collect or receive information regarding:
			1. IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device;
			2. browser type and language;
			3. referring and exit pages and URLs;
			4. date and time; and
			5. details regarding your activity on the App and/or Website, such as search queries and other performance and usage data.
		3. About Your Mobile Device. We may collect or receive information regarding:
			1. type of mobile device;
			2. advertising Identifier (“IDFA” or “AdID”);
			3. operating system and version (e.g., iOS, Android or Windows);
			4. carrier; and
			5. network type (WiFi, 3G, 4G, LTE).
		4. About Your Computer. We may collect or receive information regarding:
			1. type of computer;
			2. internet connection;
			3. operating system and version;
			4. IP address; and
			5. Browser type.
		5. From Cookies. Our App and Website utilize a standard technology called “cookies” and server logs to collect information about how our App and Website is used. Cookies are small text files an app can use to recognize a repeat visitor to the App or Website. On the App, we may use both session cookies, which expire once you close the App, persistent cookies, which stay on your mobile device until you delete them, and other technologies to help us collect data and to enhance your experience with the App. On our Website, information gathered through cookies and server logs when using the Website may include the date and time of visits, the pages viewed, time spent at our site, and the websites visited just before and just after our own, as well as your IP address. We may use cookies for various purposes, including to:
			1. determine type of mobile device or computer being used;
			2. personalize your experience;
			3. analyze which portions of the App or Website are visited and used most frequently; and
			4. measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies in the App or Website, you can opt out by setting your mobile device to reject cookies or opting out when prompted on our App or Website. You can still use the App and Website if you choose to disable cookies, although your ability to use some of the features may be affected.

1. **California Privacy Rights**. California consumers have certain additional rights afforded to them under the California Consumer Privacy Act (CCPA) and the California Online Privacy Protection Act (CalOPPA).
	1. CCPA. Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information we collect (including how we use, disclose, or may sell this information), to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights. If you are a California consumer, you may make a request pursuant to your rights under the CCPA by contacting us and we will respond within thirty (30) days. We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf. Authorized agents must submit proof of authorization. If you would like to exercise any of these rights, please contact us at operations@path-now.org.
	2. CalOPPA. We are required to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above. CalOPPA users have the following rights:
		1. Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information we collect, use, or share; (2) purposes for which categories of Personal Information are collected or used by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you.
		2. Right to Equal Service. We will not discriminate against you if you exercise your privacy rights.
		3. Right to Delete. You may submit a verifiable request to close your account and we will delete Personal Information about you that we have collected.
		4. Right to Opt-Out. You may request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at operations@path-now.org.

1. Information Collected by or Through Third-Party Advertising Companies. We may share Other Information about your activity on the App or Website with third parties for ad distribution and ad optimization, defined as the tailoring or targeting. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.
2. How to Opt Out of Third-Party Interest-Based Advertising. If you wish to opt out of third-party interest-based advertising, please visit http://www.networkadvertising.org and http://www.aboutads.info/choices for details on how to do so. Additionally, users of mobile Devices can follow the below instructions:

Android Users

For Android devices with OS 2.2 and up and Google Play Services version 4.0 and up: Open your Google Settings app > Ads > Enable “Opt out of interest-based advertising.”

iOS Users

iOS 7 or Higher: Go to your Settings > Select Privacy > Select Advertising > Enable the “Limit Ad Tracking” setting.

iOS 6: Go to your Settings > Select General > Select About > Select Advertising > Enable the “Limit Ads Tracking” setting.

1. “Do Not Track” Requests. We do not respond to web browser “do not track” signals or other mechanisms that provide users the ability to exercise choice regarding the collection of personal information about their online activities over time and across third-party web sites or online services.
2. How Information is Used and Shared.
	1. You authorize us to use the Personal Information, Payment Information, Geolocational Information, and the Other Information (collectively, the “Information”) to:
		1. provide and improve our App and/or Website;
		2. provide our services;
		3. administer our promotional programs;
		4. solicit your feedback; and
		5. inform you about our products and services.
	2. In order to provide our services and administer our promotional programs, we may share the Information with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
	3. We engage third-party companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, customer service, marketing assistance, and administration of promotional programs. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
	4. In an ongoing effort to better understand our users, the App, the Website, and our products and services, we may analyze certain Information in anonymized and aggregate form to operate, maintain, manage, and improve the App, Website, and/or such products and services. This aggregate information does not identify you personally. We may share and/or license this aggregate data to our affiliates, agents, business and promotional partners, and other third parties. We may also disclose aggregated user statistics to describe the App, the Website, and these products and services to current and prospective business partners and investors and to other third parties for other lawful purposes.
	5. We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
	6. As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
	7. To the extent permitted by law, we may also disclose the Information:
		1. when required by law, court order, or other government or law enforcement authority or regulatory agency; or
		2. whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of us or others, including you.
3. Accessing and Modifying Information and Communication Preferences. If you have provided us any Personal Information, you may access, remove, review, and/or make changes to the same by contacting us as set forth below. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing e-mails. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases. You cannot opt out of receiving transactional e-mails related to the App or Website (e.g., requests for support).

We may also deliver notifications to your mobile device (e.g., push notifications) or computer. You can disable these notifications by deleting the relevant service or by changing the settings on your device.

1. How We Protect Your Information. We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being transmitted over the Internet.
2. Email Policies. E-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. We do not sell, rent, or lease our subscription lists to third parties, and will not disclose your email address to any third parties except as allowed in this privacy Policy. In compliance with the CAN-SPAM Act, all e-mails sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all of our e-mail messages will contain concise information on how to remove yourself from our mailing list so that you receive no further e-mail communication from us. You will find instructions on how to unsubscribe from our e-mail list at the bottom of each e-mail received from us.
3. Important Notices to Non-U.S. Residents. The App and its servers are operated in the United States. If you are located outside of the United States, please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the App and/or Website, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.
	1. Individuals in the European Economic Area, the United Kingdom, Brazil, and across the globe have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to your Personal Information, as well as to seek to update, delete, or correct this information. You can do this by using the settings and tools provided in your account settings on the App or Website. If you cannot use the settings and tools, contact us at operations@path-now.org for assistance.
	2. To the extent our processing of your Personal Information is subject to the General Data Protection Regulation (GDPR) or other applicable laws requiring a legal basis for processing Personal Information, such as the UK Data Protection Act and the Brazilian General Data Protection Act (Lei Geral de Proteção de Dados), we primarily rely on its legitimate interests, described above, to process your Personal Information. Where we rely on legitimate interests to process your Personal Information, you can object to that processing by contacting us at the contact information set forth in Section 15 below. In response to your objection, we will stop processing your information for the relevant purposes unless we have compelling grounds in the circumstances or the processing is necessary in the context of legal claims. We may also process Other Information that constitutes your Personal Information for direct marketing purposes and you have a right to object to our use of your Personal Information for this purpose at any time.
4. App Stores; External Websites. Your app store (e.g., iTunes or Google Play) may collect certain information in connection with your use of the App, such as Personal Information, Payment Information, Geolocational Information, and other usage-based data. We have no control over the collection of such information by a third-party app store, and any such collection or use will be subject to that third party’s applicable privacy policies.

The App may contain links to third-party websites. We have no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

1. Children. The App is not directed to children under the age of 13. We adhere to the Children’s Online Privacy Protection Act (COPPA) and will not knowingly collect Personal Information from any child under the age of 13. We ask that minors (under the age of 13) not use the App. If a child under the age of 13 has provided us with Personal Information, a parent or guardian of that child may contact us and request that such information be deleted from our records.
2. Personnel. If you are a PATH-NOW or ADJOIN worker or applicant, we collect information you voluntarily provide to us. We use the information collected for Human Resources purposes in order to administer benefits to workers and screen applicants. You may contact us in order to (1) update or correct your information, (2) change your preferences with respect to communications and other information you receive from us, or (3) receive a record of the information we have relating to you. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion.
3. Changes to This Privacy Policy. THIS PRIVACY POLICY IS EFFECTIVE AS OF THE DATE STATED AT THE TOP OF THIS PRIVACY POLICY. WE MAY CHANGE THIS PRIVACY POLICY FROM TIME TO TIME AND ANY CHANGE WILL BE EFFECTIVE IMMEDIATELY UPON POSTING OF THE MODIFIED PRIVACY POLICY. YOU AGREE TO REVIEW THE PRIVACY POLICY PERIODICALLY TO BE AWARE OF SUCH MODIFICATIONS AND YOUR CONTINUED ACCESS OR USE OF THE APP AND/OR WEBSITE SHALL BE DEEMED YOUR CONCLUSIVE ACCEPTANCE OF THE PRIVACY POLICY, AS MODIFIED. THE EFFECTIVE DATE OF THE LATEST VERSION OF THIS PRIVACY POLICY WILL BE REFLECTED IN THE DATE LISTED ABOVE. PLEASE BE AWARE THAT, TO THE EXTENT PERMITTED BY APPLICABLE LAW, OUR USE OF THE INFORMATION IS GOVERNED BY THE PRIVACY POLICY IN EFFECT AT THE TIME WE COLLECT THE INFORMATION. PLEASE REFER BACK TO THIS PRIVACY POLICY ON A REGULAR BASIS.
4. How to Contact Us. If you have questions about this Privacy Policy, please e-mail us at [e-mail address] with “Privacy Policy” in the subject line or mail us at the following address: operations@path-now.org
5. **Governing Law.** This Privacy Policy, as well as your use of the APP and/or Website, are governed by the laws of United States without regard to its conflict of laws provision. You consent to the exclusive jurisdiction of the courts in the State of California, County of San Diego in connection with any action or dispute arising between the parties under or in connection with this Privacy Policy. Your use of the App and/or Website may also be subject to other local, state, national, or international laws.
6. **Your Consent.** By using the App and/or Website, or by contacting us directly, you agree to accept and abide by the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you should not engage with our Website, or use our App or services. Continued use of the Website, App and/or services shall be deemed your acceptance of the Privacy Policy, including any changes or amendments thereto.