

PRIVACY POLICY

OpenMeme's mission is to provide meme makers around the world with the tools to become owners of their memes so that they can profit from spreading them online and build their personal brand. In pursuing this mission, we want to be transparent about the data we collect about you, how we use it and with whom it is shared.

This Privacy Policy applies when you use our Services (described below). We offer our users choices about the data we collect, use and share as described in this Privacy Policy.

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Introduction

We are a social network and online platform for professionals. People use our Services to find and be found for business opportunities, to connect with others and find information. Our Privacy Policy applies to any Member or Visitor to our Services.

Our registered users (“Members”) share their professional identities, engage with their network, exchange knowledge and professional insights, post and view relevant content, learn and develop skills, and find business and career opportunities. Content and data on some of our Services is viewable to non-members (“Visitors”).

Services

This Privacy Policy, including our Cookie Policy applies to your use of our Services.

This Privacy Policy applies to Openmeme.io, and other communications and services (“Services”), but excluding services that state that they are offered under a different privacy policy.

Data Controllers and Contracting Parties

Ezone Group FZC LLCA-0059-341-Flamingo Villas Ajman („Ezone”) will be the controller of your personal data provided to, or collected by or for, or processed in connection with, our Services.

As a Visitor or Member of our Services, the collection, use and sharing of your personal data is subject to this Privacy Policy and other documents referenced in this Privacy Policy, as well as updates.

Change

Changes to the Privacy Policy apply to your use of our Services after the “effective date.”

Openmeme (“we” or “us”) can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account.

You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy, as of its effective date.

1. Data We Collect

1.1 Data You Provide To Us

There are two types of Users. The first type are users who want to partner up with Openmeme and create their profile. The second type are users who register only to receive the newsletter. The first type of users enters their data during registration to create an account on Openmeme, while the second type of users only enters only an e-mail address to subscribe to the newsletter and this is the end of their data delivery.

The rest of paragraph 1 applies to the first type of user

Registration

To create an account you need to provide data including your name, email address and/or mobile number, and a password. If you register for a premium Service, you will need to provide payment (e.g., credit card) and billing information.

You create your profile (a complete profile helps you get the most from our Services).

Profile

You have choices about the information on your profile. You don’t have to provide additional information on your profile. It’s your choice whether to include sensitive information on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.

Posting and Uploading

We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, (e.g., with demographic data), respond to a survey on our Services.

You don’t have to post or upload personal data; though if you don’t, it may limit your ability to grow and engage with your network over our Services.

1.2 Data From Others

Others may post or write about you.

Content and News

You and others may post content that includes information about you (as part of posts, comments, videos) on our Services.

Partners

We receive personal data (e.g., your job title and work email address) about you when you use the services of our customers and partners, such as employers or prospective employers and applicant tracking systems providing us job application data.

1.3 Service Use

We log your visits and use of our Services, including mobile apps.

We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology, such as when you view or click on content (e.g., learning video) or ads (on or off our sites and apps), perform a search, install or update one of our mobile apps, share articles or apply for jobs. We use log-ins, cookies, device information and internet protocol (“IP”) addresses to identify you and log your use.

1.4 Cookies and Similar Technologies

We collect data through cookies and similar technologies.

As further described in our Cookie Policy, we use cookies and similar technologies (e.g., pixels and ad tags) to collect data (e.g., device IDs) to recognize you and your device(s) on, off and across different services and devices where you have engaged with our Services. We also allow some others to use cookies as described in our Cookie Policy. If you are outside the Designated Countries, we also collect (or rely on others who collect) information about your device where you have not engaged with our Services (e.g., ad ID, IP address, operating system and browser information) so we can provide our Members with relevant ads and better understand their effectiveness. Learn more. You can opt out from our use of data from cookies and similar technologies that track your behavior on the sites of others for ad targeting and other ad-related purposes. For Visitors, the controls are here.

1.5 Your Device and Location

We receive data through cookies and similar technologies

When you visit or leave our Services (including some plugins and our cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to and the time of your visit. We also get information about your network and device (e.g., IP address, proxy server, operating system, web browser and add-ons, device identifier and features, cookie IDs and/or ISP, or your mobile carrier). If you use our Services from a mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other tools to identify your precise location.

1.6 Sites and Services of Others

We get data when you visit sites that include our ads, cookies or some of our plugins or when you log-in to others’ services with your account.

We receive information about your visits and interaction with services provided by others when you log-in with Openmeme or visit others’ services that include some of our plugins or our ads, cookies or similar technologies.

1.7 Other

We are improving our Services, which means we get new data and create new ways to use data.

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we collect, use or share your data, we will notify you and may also modify this Privacy Policy.

2. How We Use Your Data

We use your data to provide, support, personalize and develop our Services.

How we use your personal data will depend on which Services you use, how you use those Services and the choices you make in your settings. We use the data that we have about you to provide and personalize our Services, including with the help of automated systems and inferences we make, so that our Services (including ads) can be more relevant and useful to you and others.

2.1 Services

Our Services help you connect with others, find and be found for work and business opportunities, stay informed, get training and be more productive.

We use your data to authorize access to our Services and honor your settings.

Stay Connected

Our Services allow you to stay in touch and up to date with other Users. Subject to your and their settings, when you connect with other Users.

We use data about you to help others find your profile, and enable other Users to connect with you.

Visitors have choices about how we use their data..

2.2 Communications

We contact you and enable communications between Users. We offer settings to control what messages you receive and how often you receive some types of messages.

We will contact you through email, mobile phone, notices posted on our websites or apps, and other ways through our Services, including text messages and push notifications. We will send you messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use our Services, network updates, reminders, job suggestions and promotional messages from us and our partners. You may change your communication preferences at any time. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We also enable communications between you and others through our Services, including for example invitations, InMail, groups and messages between connections.

2.3 Advertising

We serve you tailored ads both on and off our Services. We offer you choices regarding personalized ads, but you cannot opt-out of seeing other ads.

We target (and measure the performance of) ads to Members, Visitors and others both on and off our Services directly or through a variety of partners, using the following data, whether separately or combined:

- Data from advertising technologies on and off our Services, pixels, ad tags, cookies, and device identifiers;
- Member-provided information (e.g., profile, contact information, title and industry);
- Data from your use of our Services (e.g., search history, feed, content you read, who you follow or is following you, connections, groups participation, page visits, videos you watch, clicking on an ad, etc.), including as described in Section 1.3;
- Information from advertising partners, vendors and publishers;

Ad Choices

We adhere to self-regulatory principles for interest-based advertising and participate in industry opt-outs from such ads. This does not opt you out of receiving advertising; you will continue to get other ads by advertisers not listed with these self regulatory tools. You can also opt-out specifically from our uses of certain categories of data to show you more relevant ads. For Visitors, the setting is here.

Info to Ad Providers

We do not share your personal data with any third-party advertisers or ad networks except for: (i) hashed IDs or device identifiers (to the extent they are personal data in some countries); (ii) with your separate permission (e.g., in a lead generation form) or (iii) data already visible to any users of the Services (e.g., profile). However, if you view or click on an ad on or off our Services, the ad provider will get a signal that someone visited the page that displayed the ad, and they may, through the use of mechanisms such as cookies, determine it is you. Advertising partners can associate personal data collected by the advertiser directly from you with hashed IDs or device identifiers received from us. In such instances, we seek to contractually require such advertising partners to obtain your explicit, opt-in consent before doing so.

2.4 Marketing

We promote our Services to you and others.

In addition to advertising our Services, we use Members' data and content for invitations and communications promoting membership and network growth, engagement and our Services, such as by showing your connections that you have used a feature on our Services.

2.5 Developing Services and Research

We develop our Services and conduct research

Service Development

We use data, including public feedback, to conduct research and development for our Services in order to provide you and others with a better, more intuitive and personalized experience, drive membership growth and engagement on our Services, and help connect professionals to each other and to economic opportunity.

Surveys

Polls and surveys are conducted by us and others through our Services. You are not obligated to respond to polls or surveys, and you have choices about the information you provide. You may opt-out of survey invitations.

2.6 Customer Support

We use data to help you and fix problems.

We use data (which can include your communications) to investigate, respond to and resolve complaints and for Service issues (e.g., bugs).

2.7 Insights That Do Not Identify You

We use data to generate insights that do not identify you.

We use your data to produce and share insights that do not identify you. For example, we may use your data to generate statistics about our members, their profession or industry, to calculate ad impressions served or clicked on, or to publish visitor demographics for a Service or create demographic workforce insights.

2.8 Security and Investigations

We use data for security, fraud prevention and investigations.

We use your data (including your communications) for security purposes or to prevent or investigate possible fraud or other violations of our User Agreement and/or attempts to harm our Members, Visitors or others.

3. How We Share Information

3.1 Our Services

Any data that you include on your profile and any content you post or social action (e.g., likes, follows, comments, shares) you take on our Services will be seen by others, consistent with your settings.

Profile

Your profile is fully visible to all Members and customers of our Services. Subject to your settings, it can also be visible to others on or off of our Services (e.g., Visitors to our Services or users of third-party search engines). As detailed in our Help Center, your settings, degree of connection with the viewing Member, the subscriptions they may have, their usage of our Services, access channels and search types (e.g., by name or by keyword) impact the availability of your profile and whether they can view certain fields in your profile.

3.2 Others' Services

You may link your account with others' services so that they can look up your post your shares on such platforms. Excerpts from your profile will also appear on the services of others.

Subject to your settings, other services may look up your profile. When you opt to link your account with other services, personal data will become available to them. The sharing and use of that personal data will be described in, or linked to, a consent screen when you opt to link the accounts.

Third-party services have their own privacy policies, and you may be giving them permission to use your data in ways we would not. You may revoke the link with such accounts.

Subject to your settings, excerpts from your profile will appear on the services of others (e.g., search engine results, mail and calendar applications that show a user limited profile data of the person they are meeting or messaging, social media aggregators, talent and lead managers). “Old” profile information remains on these services until they update their data cache with changes you made to your profile.

3.3 Related Services

We share your data across our different Services and Openmeme affiliated entities.

We will share your personal data with our affiliates to provide and develop our Services. We may combine information internally across the different Services covered by this Privacy Policy to help our Services be more relevant and useful to you and others.

3.4 Service Providers

We may use others to help us with our Services.

We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

3.5 Legal Disclosures

We may need to share your data when we believe it’s required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you; (3) investigate and defend ourselves against any third-party claims or allegations; (4) protect the security or integrity of our Services (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of Openmeme, our Users, personnel or others. We attempt to notify Users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

3.6 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

4. Your Choices & Obligations

4.1 Data Retention

We keep most of your personal data for as long as your account is open.

We generally retain your personal data as long as you keep your account open or as needed to provide you Services. This includes data you or others provided to us and data generated or inferred from your use of our Services. Even if you only use our Services when looking for a new job every few years, we will retain your information and keep your profile open, unless you close your account. In some cases we choose to retain certain information (e.g., insights about Services use) in a depersonalized or aggregated form.

4.2 Rights to Access and Control Your Personal Data

You can access or delete your personal data. You have many choices about how your data is collected, used and shared.

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile and controlling the visibility of your posts to advertising opt-outs and communication controls. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you, you can:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

4.3 Account Closure

We keep some of your data even after you close your account.

If you choose to close your account, your personal data will generally stop being visible to others on our Services within 24 hours. We generally delete closed account information within 30 days of account closure, except as noted below.

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory

requirements, resolve disputes, maintain security, prevent fraud and abuse (e.g., if we have restricted your account for breach of our Professional Community Policies), enforce our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed.

We do not control data that other Members have copied out of our Services.

5. Other Important Information

5.1. Security

We monitor for and try to prevent security breaches. Please use the security features available through our Services.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Please visit our Safety Center for additional information about safely using our Services, including two-factor authentication.

5.2. Cross-Border Data Transfers

We store and use your data outside your country.

We process data both inside and outside of the United States and rely on legally-provided mechanisms to lawfully transfer data across borders. Learn more. Countries where we process data may have laws which are different from, and potentially not as protective as, the laws of your own country.

5.3 Lawful Bases for Processing

We have lawful bases to collect, use and share data about you. You have choices about our use of your data. At any time, you can withdraw consent you have provided by going to settings.

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you and "legitimate interests."

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer here.

5.4. Direct Marketing and Do Not Track Signals

Our statements regarding direct marketing and "do not track" signals.

We currently do not share personal data with third parties for their direct marketing purposes without your permission. Learn more about this and about our response to "do not track" signals.

5.5. Contact Information

You can contact us or use other options to resolve any complaints.

If you have questions or complaints regarding this Policy, please first contact Openmeme online. You can also reach us by physical mail. If contacting us does not resolve your complaint, you have more options. Users may also have the right to contact our Data Protection Officer. If this does not resolve your complaint, Users can depend on the laws of the country of their residency.