

Dr. Jim Richards Community Privacy Policy

Effective Date: July 16, 2021

Dr. Jim Richards Community, LLC and its affiliates (“Company,” “we,” “our,” and/or “us”) value the privacy of individuals who use our social news applications, the websites where this Privacy Policy is posted (“Websites”) , and related services (collectively, our “Services”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from our users (“Users,” “you,” and/or “your”) to facilitate your commenting, social news, and influencer networking experience. By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Service <https://legal.drjimrichards.com/documents/termservice.pdf>

We neither sell your information to third parties nor share your information with foreign governments except in the limited circumstances described in this Privacy Policy (see Section 2 “**How We Share the Information We Collect**” below for more detail).

We recognize that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Policy as we undertake new privacy practices or adopt new privacy policies.

1. Information We Collect

“Personal Information” is information that identifies, relates to, describes, or can be reasonably linked to, directly or indirectly, a particular individual or household. We may collect Personal Information (as we have done for the past twelve months) from you on or through the Services in a variety of ways, including when you register on the Services, sign up for communications, or make any purchases. We also may, from time to time, use Personal Information about you to improve the Services, and for the various purposes outlined in this Privacy Policy.

A. Information You Provide to Us.

Registration and Profile Information. When you sign up for an account, we collect Personal Information you provide to us such as your name, email address, display name, profile photo, preferred language, and any Personal Information you voluntarily provide in your profile biography.

Verification Information. If you choose to go through the verification process, we may ask for Personal Information that can be used to verify your identity, such as scans of your government-issued photo identification. When your government-issued photo identification information is no longer necessary to verify your identity, we delete the scans (front and back). We retain only an anonymized hash corresponding to the information the identification document contains, in order to prevent identity theft and impostor accounts. In addition to the identification information, we may ask for you to take a selfie for the purpose of preventing impostor accounts. But they are deleted as soon as they are reviewed as part of the verification process.

Influencer Network Information. Unlike other platforms, Dr. Jim Richards Community allows you to monetize your content, following, and goodwill. As part of that, the law requires us to collect certain pieces of Personal Information. Specifically, in addition to identification information (see above under

“verification” for our collection and treatment of identifying information), we collect form W-9 as required by the IRS. We are required to do this in order to facilitate the receipt by you of payments earned on Dr. Jim Richards Community. However, we store that Personal Information in secure, encrypted form. We never share it, sell it, or use it in any way other than for purposes of legal compliance.

Content you Share. We collect any information you choose to provide on our Services, such as posts (“Parleys”), follows, photos, videos, gifs, comments, votes, and echoes.

Payment Information. If you make a purchase through our Services, your payment-related Personal Information, such as your credit and debit card or automated clearing house (ACH) information, is collected and stored by our third-party payment processor on our behalf.

Communications. If you contact us directly, we receive additional Personal Information about you. For example, if you contact us for customer support, we may receive your name, email address, phone number, the contents of any message or attachments you may send to us, and any other information you choose to provide.

Your Contacts. If you permit us to access the address book on your device or give us permission to import your contacts from an email account associated with your account, we may access and store names and contact information, including Personal Information, from your address book, to help you follow your contacts, and your contacts to follow you.

B. Information We Collect When You Use Our Services.

We may collect information that may not reasonably identify you or your household personally, but is linked to your computer or device (“Device Identifiable Information”). We collect Device Identifiable Information from you in the normal course of providing the Services. When you visit our Services to browse, read, or download information, we automatically collect information about your computer that your browser sends, such as your IP address, browser type and language, access times, pages visited, and referring website addresses. We may use Device Identifiable Information to analyze trends, help administer and improve the Services, to learn about and determine which pages of the Websites visitors view and for how long, how visitors navigate throughout the Services, and to gather broad demographic information for aggregate use. We may also collect Device Identifiable Information through “cookies” or “web beacons” as explained below.

Device and Location Information. We receive Device Identifiable Information about the device and software you use to access our Services, including IP address (from which approximate or “coarse” location may be inferred), device type, web browser type, operating system version, phone carrier and manufacturer, member agents, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

Usage Information. We automatically receive Device Identifiable Information about your interactions with our Services, such as the posts or other content you view, the searches you conduct, the people you follow, and the dates and times of your visits.

Information from Cookies and Similar Technologies. We may collect information using cookies, pixel tags, and similar technologies. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session

cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Cookies operate in the background and you can turn them off by adjusting your Web browser settings, but doing so may make it difficult to use some of the features on the Websites or the features may not be available to you. We may use cookies to make your Service experience easier by, for example, remembering your preferences, or keeping track of your login name and password.

For more information on your choices regarding cookies, you can review the FTC's guide to opting out of online tracking for computers and mobile devices. Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not want them to track your online activities. The Services do not currently support Do Not Track requests.

2. How We Use the Information We Collect

We may use the Personal Information we collect:

- To fulfill or meet requirements inherent in the reason you provided the information. For example, we use the information about who you follow on Dr. Jim Richards Community to deliver you a feed of Parleys from those accounts; we use the information you put into a Parley to display it to those who follow you or users who echo your Parley, or who visit your profile on Dr. Jim Richards Community;
- To create, customize, and secure your account for use of the Services;
- To provide, maintain, and improve our Services, including for testing, research, analysis and product development;
- To personalize your experience on our Services, such as by providing tailored content and recommendations;
- To understand and analyze how you use our Services and develop new products, services, features, and/or functionality;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you, including providing you with targeted offers and ads through our Website, and via email or text message (with your consent, where required by law);
- To send you text messages and push notifications;
- To facilitate transactions, redemptions, and payments;
- To verify your identity and determine your eligibility to join our influencer network;
- To find and prevent fraud and respond to trust and safety issues;

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our consumers is among the assets transferred;
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process, law enforcement or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without updating this Privacy Policy to provide you with notice as set out in Section 10 “**Changes to the Privacy Policy**” below.

3. How We Share the Information We Collect

Vendors and Service Providers. We may share any Personal Information we receive with vendors and service providers retained in connection with the provision of our Services.

Content you Share. Our Services are social services which allow you to find, enjoy, and share content. Your name, display name, profile photo, about me section, and contacts (i.e., members you are following) will always be viewable and/or searchable by other Members. The content you post to our Services will be displayed and viewable by other Members by default. Although this content is public by default, in the “Your Choices” section below, we describe the account settings and controls you can use to limit the sharing of certain information. We are not responsible for other Members’ use of available information, so you should carefully consider whether and what to post and how you identify yourself on our Services.

Marketing. We do not share Personal Information about you with nonaffiliated third parties for their direct marketing purposes unless we have your affirmative express consent.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your Personal Information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others’ rights, property, or safety. For the avoidance of doubt, the disclosure of your Personal Information may occur if you post any objectionable content on or through our Services.

Merger, Sale, or Other Asset Transfers. We may transfer your Personal Information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your Personal Information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time of the acquisition or merger.

Consent. We may also disclose your Personal Information with your permission.

4. Your Choices

Sharing Preferences. We provide you with settings to allow you to set your sharing preferences for content you post to our Services. Certain Personal Information, such as your display name, may always be publicly available to others, and other Personal Information is made publicly available to others by default. To change whether certain information is publicly viewable, you can adjust the settings in your account.

Marketing Communications. We send you marketing communications consistent with your choices. You can unsubscribe from our promotional emails by adjusting your account settings or via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

Notifications. You can opt-out of receiving notifications for posts, votes, echoes, comments, and followers by adjusting your profile and/or operating system (i.e., iOS or Android) settings.

Correction. You may correct your Personal Information at any time by logging in to your account and updating any inaccurate information.

Additional Privacy Rights. In addition, if you are a resident of California or of the European Economic Area, you have additional rights with respect to your Personal Information. Please see Sections 11 and 12 below for additional information.

5. Third Party Links and Sites

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

For example, any information you share with Google as a consequence of sharing or interacting with YouTube content on Dr. Jim Richards Community is governed by [Google's privacy policy](#). Google now provides users some control over the collection of data by its users and API Clients like Dr. Jim Richards Community; [follow this link for more](#) information on revoking an API client's access to your data. Exercising such control may require having a Google account, which itself may be a privacy concern for some of our members. Therefore, members are encouraged to use Dr. Jim Richard's own native video capabilities (or the capabilities of other platforms equally respectful of member privacy) if they wish to avoid sharing data with Google. (A similar disclaimer applies to Rumble, an emerging competitor of Google-YouTube. When in doubt, consult the privacy policy of the entity responsible for facilitating the display of content on our Services, before choosing to interact with it, so you can make an informed decision about your privacy.)

6. Security

We make reasonable efforts to protect your Personal Information by using physical and electronic safeguards designed to improve the security of the Personal Information we maintain. However, no method of transmission or storage of data is 100% secure and we will not be responsible for any damage that results from a security breach of data or the unauthorized access to or use of

information, whether Personal Information or Device Identifiable Information. To the extent we provide your Personal Information to any third parties, we will request that they use reasonable security measures to protect your information.

7. Children’s Data

We do not knowingly collect, maintain, or use Personal Information from children under 13 years of age, and no part of our Services is directed to children. If you learn that a child has provided us with Personal Information in violation of this Privacy Policy, then you may alert us at privacy@drjimrichards.com and we will delete such information.

8. International Transfers of Data

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use our Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your Personal Information outside of those regions to the United States for storage and processing. By providing any information, including Personal Information, on or to our Services, you consent to such transfer, storage, and processing.

9. Update or Delete Your Information

You can update your account and profile information through your account settings. You can delete your account by contacting: privacy@drjimrichards.com .

10. Changes to the Privacy Policy

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share Personal Information previously collected from you through our Services, we will notify you through our Services, by email, or other communication. **Your continued use of our Services following our posting or notifying you of changes constitutes your acceptance of such changes.**

11. Additional Rights in California: Your California Privacy Rights

If you are a California resident, the California Consumer Privacy Act of 2018 (“CCPA”) provides you with additional rights regarding our use of your Personal Information. Note that Personal Information does not include publicly available information from government records, deidentified or aggregated consumer information, or information excluded from the CCPA’s scope. The CCPA protects the following categories of Personal Information, and for your convenience, we have provided the following chart summarizing what categories we collect as another way of covering the information set forth in Section 1 “**Information We Collect**”:

Category	Examples	Collected
1. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Some items. See Section 1 "Information We Collect" for more details.
2. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	Some items. See Section 1 "Information We Collect" for more details.
3. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Only if you choose to provide it in the verification process or in user-generated content (such as uploading an image or video sharing this information, or including in a bio), but this information is not analyzed.
4. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Only records of (1) device type used in connection with your account, and (2) purchases of ads on Dr. Jim Richards Community (if applicable).

Category	Examples	Collected
5. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Only if you choose to provide it in user-generated content (such as uploading an image or video sharing this information, or including in a bio), but the information is analyzed only for compliance with applicable law and as described in our Guidelines Enforcement Process.
6. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	See Section 1(B) to learn more about how some of these items may be collected and used.
7. Geolocation data.	Physical location or movements including e.g., IP address information.	Only coarse location data inferred from IP address.
8. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Only if using device to capture, audio, photo or video with the Services as part of user-generated content.
9. Professional or employment-related information.	Current or past job history or performance evaluations.	Only if you choose to provide it in user-generated content, for example a Parley, your profile bio, or display name. But this information is not further analyzed.
10. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Only if you choose to provide it in user-generated content, for example a Parley, your profile bio, or display name. But this information is not analyzed.
11. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

All of the categories collected above may be provided to third parties as described in Section 3 “**How We Share the Information We Collect**”.

A. Your Rights and Choices under the CCPA.

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months (the “right to know”). Once we receive your request and confirm your identity (see the “**Exercising Your Rights to Know or Delete**” subsection below), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- If we disclosed your Personal Information for a business purpose, two separate lists disclosing:

sales, identifying the Personal Information categories that each category of recipient purchased; and

disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

- The specific pieces of Personal Information we collected about you (also called a “data portability request”).

Right to Delete

You have the right to request that we delete any of your Personal Information that we have collected and retained, subject to certain exceptions (the “right to delete”). Once we receive your request and confirm your identity (see “**Exercising Your Rights to Know or Delete**”), we will review your request to see if an applicable exception allows us to retain the information. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request to privacy@drjimrichards.com

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your Personal Information by submitting proof of identity and, in the case of someone legally authorized to act on your behalf, proof of their authority to act.

You may also make a request to know or delete on behalf of your child by providing proof of identity.

You may submit a request to know only twice within a 12-month period. Your request to know or delete must provide information sufficient for us to reasonably verify you are the person about whom we collected Personal Information (or you are an authorized representative of same), as well as describe your request with enough detail for us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

You do not need to create an account with us to submit a request to know or delete. We will use Personal Information provided in the request only to verify the requestor's identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see "**Personal Information Sales Opt-Out and Opt-In Rights**" below.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us at privacy@drjimrichards.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account, or to the email address associated with the account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

The CCPA prohibits a business from selling Personal Information unless you have received explicit notice and an opportunity to opt out of further sales. We do not sell your Personal Information to third parties. If this position changes and you are older than 16, you will be given explicit notice and an opportunity to opt out of further sales, with details of how to exercise that “right to opt out” listed in this policy.

We do not sell the Personal Information of any consumer, including consumers we actually know are less than 16 years old, unless we receive affirmative authorization (the “right to opt in”) from either the consumer who is between 13 and 15 years old, or the parent or guardian of a consumer less than 13 years old. Consumers who opt in to Personal Information sales may opt out of future sales at any time.

We will only use Personal Information provided in an opt-out request to review and comply with the request.

B. Non-Discrimination under the CCPA.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will

reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

C. Other California Privacy Rights.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. Not all information sharing is covered by the "Shine The Light" requirements and only information on covered sharing may be included in our response. To make such a request, please do so via email at: privacy@drjimrichards.com

12. Your Additional Rights in the European Economic Area

If your personal data has been collected in connection with our activities in the European Economic Area ("EEA"), you have the following rights:

- Withdrawal of Consent: If consent is the lawful basis of our processing, you have the right to withdraw any consent that you have provided to us to process your personal data.
- Access: You have the right to access your personal data.
- Rectification: You have the right to rectify inaccurate personal data.
- Erasure: You have the right to have your personal data erased if it is no longer necessary for the purposes for which it was processed, you have withdrawn your consent to, or object to, its processing and there is no other legitimate grounds for processing it or you believe that it has been unlawfully processed.
- Restriction: You have the right to have the processing of your personal data restricted if you contest its accuracy, if its processing is unlawful, if we no longer need it but you need it preserved for purposes of a legal claim, or if you have objected to its processing and are awaiting verification of our legitimate grounds for processing it.
- Data Portability: You have the right to have certain personal data you provide to us transferred to another company in a machine-readable format.
- Objection: You have the right to let us know that you object to the further use or disclosure of your personal data for certain purposes.

In order to exercise any of these rights, or for more information, please use the contact details specified in below in the "Contact Information" section. Please note that these rights are subject to certain preconditions and qualifications under applicable law.

You also have the right (where applicable) to withdraw any consent given in relation to the processing of your Personal Information.

Please note that the right to erasure is not absolute and it may not always be possible to erase personal data on request, including for example where the Personal Information must be retained to comply with a legal obligation.

If you are in the EEA, you may lodge a complaint with a supervisory authority that has authority in your country or region. Please see the following website for contact information of the data protection authorities for member countries in the EEA: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Dr. Jim Richards Community, LLC is the data controller with respect to processing of your Personal Information in connection with the Services.

13. Contact Information

If you have any questions, comments, or concerns about our processing activities, please email us at privacy@drjimrichards.com. Please note that emails to privacy@drjimrichards.com should include only questions, comments, or concerns regarding our processing activities. To make a request for access or deletion of your Personal Information as permitted by law, please submit a request to privacy@drjimrichards.com

Last Updated: August 13, 2021