

Privacy Policy

Last updated: Dec 26, 2024

This Privacy Policy applies to Realy services (the “Platform”), which include Realy apps, websites, software and related services accessed via any platform or device that link to this Privacy Policy. The Platform is provided and controlled by Eyelink Inc. (“Eyelink”, “we” or “us”). We are committed to protecting and respecting your privacy.

What Information We Collect

We may collect information from and about you, including information that you provide, information from other sources, and automatically collected information.

Information You Provide

When you create an account, upload content, contact us directly, or otherwise use the Platform, you may provide some or all of the following information:

- Account and profile information, such as name, age, username, password, language, email, phone number, social media account information, and profile image.
- User-generated content, including comments, photographs, livestreams, audio recordings, videos, text, hashtags, and virtual item videos that you choose to create with or upload to the Platform (“User Content”) and the associated metadata, such as when, where, and by whom the content was created. Even if you are not a user, information about you may appear in User Content created or published by users on the Platform. When you create User Content, we may upload or import it to the Platform before you save or post the User Content (also known as pre-uploading), for example, in order to recommend audio options, generate captions, and provide other personalized recommendations. If you apply an effect to your User Content, we may collect a version of your User Content that does not include the effect.
- Messages, which include information you provide when you compose, send, or receive messages through the Platform’s messaging functionalities. They include

messages you send through our chat functionality when communicating with sellers who sell goods to you, and your use of virtual assistants when purchasing items through the Platform. That information includes the content of the message and information about the message, such as when it was sent, received, or read, and message participants. Please be aware that messages you choose to send to other users of the Platform will be accessible by those users and that we are not responsible for the manner in which those users use or share the messages.

- Information, including text, images, and videos, found in your device's clipboard, with your permission. For example, if you choose to initiate information sharing with a third-party platform, or choose to paste content from the clipboard onto the Platform, we access this information stored in your clipboard in order to fulfill your request.
- Purchase information, including payment card numbers or other third-party payment information (such as PayPal) where required for the purpose of payment, and billing and shipping address. We also collect information that is required for extended warranty purposes and your transaction and purchase history on or through the Platform.
- Your phone and social network contacts, with your permission. If you choose to find other users through your phone contacts, we will access and collect information such as names, phone numbers, and email addresses, and match that information against existing users of the Platform. If you choose to find other users through your social network contacts, we will collect your public profile information as well as names and profiles of your social network contacts.
- Your choices and communication preferences.
- Information to verify an account such as proof of identity or age.
- Information in correspondence you send to us, including when you contact us for support.
- Information you share through surveys or your participation in challenges, research, promotions, marketing campaigns, events, or contests such as your gender, age, likeness, and preferences.

Information From Other Sources

We may receive the information described in this Privacy Policy from other sources, such as:

- If you choose to sign-up or log-in to the Platform using a third-party service such as TikTok, Facebook, Twitter, Instagram, or Google, or link your Realy account to a third-party service, we may collect information from the service—for example, your public profile information (such as nickname), email, and contact list.
- Advertisers, measurement and other partners share information with us about you and the actions you have taken outside of the Platform, such as your activities on other websites and apps or in stores, including the products or services you purchased, online or in person. These partners also share information with us, such as mobile identifiers for advertising, hashed email addresses and phone numbers, and cookie identifiers, which we use to help match you and your actions outside of the Platform with your Realy account. Some of our advertisers and other partners may enable us to collect similar information directly from their websites or apps.
- We may obtain information about you from certain affiliated entities within our corporate group, including about your activities on their platform.
- We may receive information about you from others, including where you are included or mentioned in User Content, direct messages, in a complaint, appeal, request or feedback submitted to us, or if your contact information is provided to us.
- We may also collect or receive information about you from organizations, businesses, people, and others, including, for example, publicly available sources, government authorities, professional organizations, and charity groups.

Automatically Collected Information

We automatically collect certain information from you when you use the Platform, including internet or other network activity information such as your IP address, geolocation-related data, unique device identifiers, browsing and search history (including content you have viewed in the Platform), and Cookies.

- **Usage Information.** We collect information regarding your use of the Platform and any other User Content that you generate through or upload to our Platform.
- **Device Information.** We collect certain information about the device you use to access the Platform, such as your IP address, user agent, mobile carrier, time zone settings, identifiers for advertising purposes, model of your device, the device system, network type, device IDs, your screen resolution and operating system, app and file names and types, keystroke patterns or rhythms, battery state, audio settings and connected audio devices. We automatically assign you a device ID and user ID. Where you log-in from multiple devices, we will be able to use information such as your device ID and user ID to identify your activity across devices. We may also associate you with information collected from devices other than those you use to log-in to the Platform.
- **Location Data.** We collect information about your approximate location, including location information based on your SIM card and/or IP address. In addition, we collect location information (such as tourist attractions, shops, or other points of interest) if you choose to add the location information to your User Content. Current versions of the app do not collect precise or approximate GPS information from U.S. users. If you are still using an older version that allowed for collection of precise or approximate GPS information (last release in August 2020) and you granted us permission to do so, we may collect such information.
- **Image and Audio Information.** We may collect information about the videos, images and audio that are a part of your User Content, such as identifying the objects and scenery that appear, the existence and location within an image of face and body features and attributes, the nature of the audio, and the text of the words spoken in your User Content. We may collect this information to enable special video effects, for content moderation, for demographic classification, for content and ad recommendations, and for other non-personally-identifying operations. We may collect biometric identifiers and biometric information as defined under U.S. laws, such as faceprints and voiceprints, from your User Content. Where required by law, we will seek any required permissions from you prior to any such collection.
- **Metadata.** When you upload or create User Content, you automatically upload certain metadata that is connected to the User Content. Metadata describes other data and provides information about your User Content that will not always

be evident to the viewer. For example, in connection with your User Content the metadata can describe how, when, where, and by whom the piece of User Content was created, collected, or modified and how that content is formatted. It also includes information, such as your account name, that enables other users to trace back the User Content to your user account. Additionally, metadata includes data that you choose to provide with your User Content, e.g., any captions or keywords.

- **Cookies.** We and our service providers and business partners use cookies and other similar technologies (e.g., web beacons, flash cookies, etc.) (“Cookies”) to automatically collect information, measure and analyze how you use the Platform, including which pages you view most often and how you interact with content, enhance your experience using the Platform, improve the Platform, provide you with advertising, and measure the effectiveness of advertisements and other content. We and our partners also use Cookies to promote the Platform on other platforms and websites. Cookies enable the Platform to provide certain features and functionality. Web beacons are very small images or small pieces of data embedded in images, also known as “pixel tags” or “clear GIFs,” that can recognize Cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device. To learn how to disable certain Cookies, see the [“Your Choices”](#) section below.

We may link your contact or account information with your activity on and off our Platform across all your devices, using your email or other log-in or device information. We may use this information to display advertisements on our Platform tailored to your interests, preferences, and characteristics.

We are not responsible for the privacy practices of our service providers and business partners, and the information practices of these service providers and business partners are not covered by this Privacy Policy.

We may aggregate or de-identify the information described above. Aggregated or de-identified data is not subject to this Privacy Policy.

Children's Privacy

IF YOU ARE UNDER 13 YEARS OF AGE, THEN YOU MAY NOT USE OR ACCESS REALY SERVICES AT ANY TIME OR IN ANY MANNER.

Protecting the privacy of young children is especially important. For that reason, Realy does not knowingly collect or maintain personal information (as defined by the United States Children's Online Privacy Protection Act) from persons under 13 years-of-age. If Realy learns that personal information of persons under 13 has been collected on or through the Platform, we will take appropriate steps to delete this information.

If you are the parent or legal guardian of a child under 13 who has created an account on Realy Services, then please email hello@realy.com to have that child's account terminated and personal information deleted.

For residents of countries and regions where the processing of personal information is based on consent, Realy will not knowingly engage in that processing for users under the age of consent established by applicable data protection law. If we learn that we are engaged in that processing with such users, we will halt such processing and will take reasonable measures to promptly remove applicable information from our records

How We Use Your Information

As explained below, we use your information to improve, support and administer the Platform, to allow you to use its functionalities, and to fulfill and enforce our Terms of Service. We may also use your information to, among other things, show you suggestions, promote the Platform, and customize your ad experience.

We may use the Information We Collect:

- To fulfill requests for products, services, Platform functionality, support and information for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes and to solicit your feedback.

- To customize the content you see when you use the Platform. For example, we may provide you with services based on the country settings you have chosen or show you content that is similar to content that you have liked or interacted with.
- To send promotional materials from us or on behalf of our affiliates and trusted third parties.
- To improve and develop our Platform and conduct product development.
- To measure and understand the effectiveness of the advertisements we serve to you and others and to deliver advertising, including targeted advertising, to you on the Platform.
- To make suggestions and provide a customized ad experience.
- To support the social functions of the Platform, including to permit you and others to connect with each other (for example, through our Find Friends function), to suggest accounts to you and others, and for you and others to share, download, and otherwise interact with User Content posted through the Platform.
- To use User Content as part of our advertising and marketing campaigns to promote the Platform.
- To understand how you use the Platform, including across your devices.
- To infer additional information about you, such as your age, gender, and interests.
- To help us detect abuse, fraud, and illegal activity on the Platform.
- To promote the safety and security of the Platform, including by scanning, analyzing, and reviewing User Content, messages and associated metadata for violations of our Terms of Service, Community Guidelines, or other conditions and policies.
- To verify your identity in order to use certain features, such as livestream or verified accounts, or when you apply for a Business Account, to ensure that you are old enough to use the Platform (as required by law), or in other instances where verification may be required.
- To communicate with you, including to notify you about changes in our services.
- To announce you as a winner of our contests or promotions if permitted by the promotion rule, and to send you any applicable prizes.
- To enforce our Terms of Service, Community Guidelines, and other conditions and policies.
- Consistent with your permissions, to provide you with location-based services, such as advertising and other personalized content.

- To train and improve our technology, such as our machine learning models and algorithms.
- To combine all the Information We Collect or receive about you for any of the foregoing purposes.
- To facilitate sales, promotion, and purchases of goods and services and to provide user support.
- For any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

Profiling: We do not engage in profiling which results in legal or similarly significant effects, as defined under applicable law.

How We Share Your Information

We are committed to maintaining your trust, and while Realy does not sell your personal information or share your personal information with third parties for purposes of cross-context behavioral advertising where restricted by applicable law, we want you to understand when and with whom we may share the Information We Collect for business purposes.

Service Providers and Business Partners

We share the categories of personal information listed above with service providers and business partners to help us perform business operations and for business purposes, including research, payment processing and transaction fulfillment, database maintenance, administering contests and special offers, technology services, deliveries, sending communications, advertising and marketing services, analytics, measurement, data storage and hosting, disaster recovery, search engine optimization, and data processing. These service providers and business partners may include:

- Payment processors and transaction fulfillment providers, who may receive the Information You Provide, Information From Other Sources, and Automatically Collected Information but who do not receive your message data, including, for example, the following third-party payment providers/processors: PayPal

(<https://www.paypal.com/us/webapps/mpp/ua/privacy-full>) and Stripe (<https://stripe.com/en-ie/privacy>).

- Customer and technical support providers, who may receive the Information You Provide, Information From Other Sources, and Automatically Collected Information.
- Researchers who may receive the Information You Provide, Information From Other Sources, and Automatically Collected Information but would not receive your payment information or message data.
- Advertising, marketing, and analytics vendors, who may receive the Information You Provide, Information From Other Sources, and Automatically Collected Information but would not receive your payment information or message data.

Within Our Corporate Group

As a global company, the Platform is supported by certain entities within our corporate group, which are given limited remote access to Information We Collect as necessary to enable them to provide certain important functions.

In Connection with a Sale, Merger, or Other Business Transfer

We may share all of the Information We Collect in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sales, or in the unlikely event of bankruptcy.

For Legal Reasons

We may disclose any of the Information We Collect to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims, or government inquiries, and to protect and defend the rights, interests, safety, and security of the Platform, our affiliates, users, or the public. We may also share any of the Information We Collect to enforce any terms applicable to the Platform, to exercise or defend any legal claims, and comply with any applicable law.

With Your Consent

We may share your information for other purposes pursuant to your consent or at your direction.

We may partner with third-party services (such as TikTok, Facebook, Instagram, Twitter, and Google) to offer you a seamless sign-up, log-in, and content-sharing experience. We may share information about you with these third-party services if you choose to use these features. For example, the services may receive information about your activity on the Platform and may notify your connections on the third-party services about your use of the Platform, in accordance with their privacy policies. If you choose to allow a third-party service to access your account, we will share certain information about you with the third party. Depending on the permissions you grant, the third party may be able to obtain your account information and other information you choose to provide.

If you choose to engage in public activities on the Platform, you should be aware that any information you share may be read, collected, or used by other users. You should use caution in disclosing personal information while using the Platform. We are not responsible for the information you choose to submit.

When you make a purchase from a third party on the Platform, including from a seller selling products through our shopping features, we share the information related to the transaction with that third party and their service providers and transaction fulfillment providers. By making the purchase, you are directing us to share your information in this way. These entities may use the information shared in accordance with their privacy policies.

Your Rights

You may submit a request to know, access, correct or delete the information we have collected from or about you by emailing us at hello@realty.com. You may appeal any decision we have made about your request by following the instructions in the communication you receive from us notifying you of our decision. You can also update your account information directly through your in-app settings, as well as request a copy of your Realy data or request to deactivate or delete your account.

You may be entitled, in accordance with applicable law, to submit a request through an authorized agent. To designate an authorized agent to exercise choices on your behalf, please provide evidence that you have given such agent power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. We will respond to your request consistent with applicable law and subject to proper verification. We will verify your request by asking you to send it from the email address associated with your account or to provide information necessary to verify your account.

While some of the information that we collect, use, and disclose may constitute sensitive personal information under applicable state privacy laws, such as information from users under the relevant age threshold, information you disclose in survey responses or in your User Content about your racial or ethnic origin, national origin, religious beliefs, mental or physical health diagnosis, sexual life or sexual orientation, status as transgender or nonbinary, citizenship or immigration status, or financial information, we only process such information in order to provide the Platform and within other exemptions under applicable law. For example, we may process your financial information in order to provide you the goods or services you request from us or your driver's license number in order to verify your identity.

Your Choices

- You may be able to control some of the Information We Collect through your device browser settings to refuse or disable Cookies. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of Cookies. In addition, your choice to disable Cookies is specific to the particular browser or device that you are using when you disable Cookies, so you may need to separately disable Cookies for each type of browser or device. If you choose to refuse, disable, or delete Cookies, some of the functionality of the Platform may no longer be available to you. Without this information, we are not able to provide you with all of the requested services.
- You may navigate to "Ads" in your in-app settings when relevant to opt-out of targeted advertising based on personal information about your activity on nonaffiliated apps and websites.

- You may be able to manage third-party advertising preferences for some of the third parties we work with to serve advertising across the Internet by using the choices available at https://www.networkadvertising.org/managing/opt_out.asp and <https://www.aboutads.info/choices>.
- Your device may have controls that determine what Information We Collect. For example, you can control whether we can collect your mobile advertising identifier for advertising through settings on your Apple and Android devices.
- You can opt out of marketing or advertising emails by using the “unsubscribe” link or mechanism noted in marketing or advertising emails.
- Current versions of the app do not collect precise or approximate GPS information from U.S. users. If you are still using an older version that allowed for collection of precise or approximate GPS information (last release in August 2020) and you granted us permission to do so, you can prevent your device from sharing such information with the Platform at any time through your device’s operating system settings.
- If you have registered for an account, you may access, review, and update certain personal information that you have provided to us by logging into your account and using available features and functionalities.
- Some browsers transmit “do-not-track” signals to websites. Because of differences in how browsers incorporate and activate this feature, we currently do not take action in response to these signals.

Data Security and Retention

We use reasonable measures to help protect information from loss, theft, misuse, unauthorized access, disclosure, alteration, or destruction. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure. Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

We retain information for as long as necessary to provide the Platform and for the other purposes set out in this Privacy Policy. We also retain information when necessary to comply with contractual and legal obligations, when we have a legitimate business

interest to do so (such as improving and developing the Platform, and enhancing its safety, security and stability), and for the exercise or defense of legal claims.

The retention periods are different depending on different criteria, such as the type of information and the purposes for which we use the information. For example, when we process your information such as your profile information to provide you with the Platform, we keep this information for as long as you have an account. If you violate our Terms of Service, Community Guidelines, or other conditions or policies, we may remove your profile immediately, but may keep other information about you to process the violation.

Realy may transmit your data to its servers or data centers outside of the United States for storage and/or processing. Other entities with whom Realy may share your data as described herein may be located outside of the United States.

Other Rights

Sharing for Direct Marketing Purposes (Shine the Light)

If you are a California resident, once a calendar year, you may be entitled to obtain information about personal information that we shared, if any, with other businesses for their own direct marketing uses. To submit a request, contact us at hello@realty.com.

Content Removal for Users Under 18

Users of the Platform who are California residents and are under 18 years of age may request and obtain removal of User Content they posted by contacting us at: hello@realty.com. All requests must provide a description of the User Content you want removed and information reasonably sufficient to permit us to locate that User Content. We do not accept California Removal Requests via postal mail, telephone, or facsimile. We may not be able to respond if you do not provide adequate information. Please note that your request does not ensure complete or comprehensive removal of the material. For example, User Content that you have posted may be republished or reposted by another user.

Users of the Platform who are Connecticut residents and are under 18 years of age, and parents and guardians of users of the Platform who are Connecticut residents under 16

years of age, may request that we unpublish or delete their own account (for users aged 13 through 17) or their child's account (for parents and guardians with teen users under 16) by emailing us at hello@realy.com.

Privacy Policy Updates

We may update this Privacy Policy from time to time. When we update the Privacy Policy, we will notify you by updating the "Last Updated" date at the top of the new Privacy Policy, posting the new Privacy Policy, or providing any other notice required by applicable law. We recommend that you review the Privacy Policy each time you visit the Platform to stay informed of our privacy practices.

Contact Us

Questions, comments and requests regarding this Privacy Policy should be addressed to: hello@realy.com.