Triller – Privacy Policy

Effective Date: July 12, 2018

This Privacy Policy explains how Triller, Inc. and its subsidiaries (collectively, “Triller,” “we,” “our” or “us”) collect, use and share your information, including personal data when you visit our website or mobile applications (collectively, the “Services”). Triller recognizes that you care about how your information is used, and your privacy is important to us. This Privacy Policy explains how we may collect and use your information, particularly your personal information, and the choices you can make about what information you share.

If you are located in the European Union (“EU”), this Privacy Policy also informs you about the management of your personal data and your rights in accordance with Article 13 of the General Data Protection Regulation (“GDPR”).

This Privacy Policy applies to information collected by Triller and any affiliated or subsidiary entities, including, but not limited to, all websites or apps that post a link to this Privacy Policy. Please read this Privacy Policy carefully. By continuing to interact with our Sites, you are agreeing to the practices described in this Privacy Policy.

Data Controller

Triller is the entity responsible for determining the means and purposes of processing personal data (i.e., the data controller) under this Privacy Policy and can be contacted as explained below in the How to Contact Us section.

Changes to the Privacy Policy

We ask that you read this Privacy Policy from time to time. We may modify it at any time in our sole discretion. If we make material changes to this Privacy Policy that increase our rights to use personal information that we have previously collected about you, we will obtain your consent, where required by law, either through your registered email address or by prominent posting on the Services. If Triller intends to further process collected personal information for a purpose other than that for which the personal information was collected, prior to that further processing, Triller shall provide you with information on that other purpose and with additional information necessary to ensure fair and transparent processing. If you are an individual located outside of the EU, your use of the Services indicates that you accept the terms of this Privacy Policy.

Personal Information We Collect About You

Triller collects the following types of personal information about you when you register to use the Services, log in with social networking credentials, submit information through the Services, or otherwise communicate with us:
Account Registration. You may browse the public-facing portions of the Services without registering an account with Triller. If you register an account with us to use the Services, then you must provide us with certain information, such as your email address.

Use of the Services. We collect information that you post to the Services. For example, when you post comments, a short biography or user generated videos ("UGVs") on the Services, we will collect the information you include in these submissions, including any personal information.

Messages. We collect and process information you provide, including any personal information, in the context of composing, sending, or receiving messages through our Services’ messaging functionality, and we may collect information about your use of our messaging functionality. Please be aware that messages sent to other users of our Services will be accessible by those other users and that we are not responsible for the manner in which those users use or disclose messages.

Location Information. We collect information about your location if you grant us permission to do so. If you change your mind and do not want us to collect your location information, then you can navigate to your device “Settings” and choose to not allow Triller to access your location. You can also tag your location in a user video. If you do not want to share your location with others, do not tag your location.

Customer Support. We collect information that you provide to us, including any personal information, when you contact us for customer-support purposes.

In-App Purchases. We collect information that you provide to us for the purpose of facilitating your purchases.

You may use some aspects of the Services at any time without providing any personal information. While providing personal information is voluntary, you may not be able to take advantage of or participate in some of the Services, if you choose not to share it.

Personal Data We Collect Automatically

We automatically collect information about the devices that you use to interact with the Services, as well as information about how you interact with the Services. The information automatically collected will be associated with any personal information you have provided.

We automatically collect the following information:

- Your IP address;
- Device Identifiers;
- Web browser type and version;
- Location, based on IP address;
- Page/app views;
• Date and time pages viewed;
• Language used; and
• Telephone number.

**IP Addresses**

An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our website, we view the IP address of the device you use to connect to the Internet. We then use this information to determine the general physical location of the device and understand the general locations of our website visitors. We also use this information to enhance our Sites.

**How We Use Personal Information We Collect About You**

We use your personal information for the following purposes:

• To provide the Services;
• To provide you customer support;
• To communicate with you regarding updates or information related to the Services, including promotions and other opportunities;
• To personalize your experience while using the Services;
• For internal operations, including troubleshooting, data analysis, testing, research, and statistical purposes;
• To connect social media to the Services;
• To deliver relevant advertising to you;
• To protect against and detect fraud, abuse or other unlawful activity;
• To enforce our Terms of Service, other corporate policies and industry standards; and
• To comply with all applicable laws and reporting obligations.

**Unsubscribing from Communications.** Triller would like to use your personal information to communicate with you directly, via email or push notifications, about products and services that we believe may be of interest to you, as well as for customer support. If you no longer want to be contacted, you may update your email preferences by using the “Unsubscribe” link found in the emails we send to you or by contacting us at team@triller.co. To disable push notifications, access Settings on your device and select the apps you no longer wish to receive push notifications from.

**How We Share Your Personal Information To Support Business Services and for Advertisements.**
We share your personal information with third parties who perform services on our behalf, such as collecting analytics to help us better serve content and serving advertisements.

User Content and Information

User content you post to the Service, such as UGVs, comments and your short biography, will be displayed on the service and viewable by other users. In addition, your profile information, such as your photograph and username, will be searchable and accessible by other users. We are not responsible for the privacy practices of the other users who will view and use this information, so you should carefully consider whether to post any user content on the Service or how you identify yourself on the Service. You should not disclose your home address or the address of your place of business, school or other locations you frequent on a regular basis in any user content.

Location Information

You may share your location information with other users by tagging your UGVs with your location information. We do not share your location with other users, aside from the location information that you choose to share.

Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy or liquidation where the business will not continue as a going concern, receivership, sale of Triller assets, or transition of the Service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. 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 the applicable Personal Information was collected.

We will also disclose information about you:

- If you consent to the disclosure of your personal information;
- If we are required to do so by law or legal process;
- To law enforcement authorities or other government officials pursuant to lawful requests;
- To verify compliance with and enforce our Terms of Service and other policies governing our Services;
- To protect our property, Services and legal rights;
- To protect personal safety or the property of others;
- To support auditing, compliance and corporate governance functions; or
- To comply with any and all applicable laws.
We do not rent, sell, or share personal information about you with other people or nonaffiliated companies for their direct marketing purposes, unless we have your permission.

**Social Networking**

Our Sites and Services allow you to sign into and associate your social network accounts including Twitter, Facebook, and Instagram.

By using this functionality, you give Triller permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network’s terms of use and this Privacy Policy. Please refer to the privacy settings in your social network account for information about what data is shared with Triller and other connected applications and to manage the data that is shared through your account, including information about your activities using our Sites.

Triller does not retain your username or password for social networking platforms for any longer than is necessary to complete an interaction. If you would like to disconnect a social media account from Triller, refer to the settings of that social media account and its provider.

**Links to Other Websites**

Our Sites may provide links to other websites for your convenience and information. These websites may operate independently from our Sites. Linked websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not part of this website, we are not responsible for their content, any use of the websites, or the privacy practices of any of those websites.

**How We Protect Children’s Privacy**

The Services are general audience services not directed at children under the age of 16. If we obtain actual knowledge that any information we collect has been provided to an individual under the age of 16, we will promptly delete that information.

**Security of Your Information**

We maintain administrative, technical, and physical safeguards to protect against loss, misuse, unauthorized access, disclosure, alteration, or destruction of the information you provide when visiting or using the Sites.

**Retention of Information**

Triller retains all personal information for the duration of the relevant business relationship or, where required, in accordance with its information management plans and schedules.

**Your California Privacy Rights**

Pursuant to California Civil Code Section 1798.83(c)(2), Triller does not share your personal information with third parties for those third parties’ direct marketing use.
If you are a California resident under the age of 18, and a registered user of any Site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [team@triller.co]. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

**Location and Transfer of Personal Data**

Personal information that you provide to us and that we collect may be stored on servers, databases and with third-party service providers in the United States and other countries whose data protection laws may differ from the jurisdiction in which you live. When we transfer personal information from the EU, we put in place appropriate safeguards to ensure the safe and secure transfer and handling of such information.

**Notice to Individuals Located in the EU**

If you are located in the EU, you have certain rights with respect to your personal information. If you would like to exercise those rights, please contact us at [email] or through one of the methods listed in the How to Contact Us section.

**Legal Basis for Processing**

We will rely on one of the following legal bases for processing your personal information:

**You have consented to the processing of your personal information.** We will obtain your consent for some uses of your personal information, such as to send you information about our Services. If you consent to our use of your personal information for any purpose, you have the right to withdraw consent at any time by contacting us as described above.

**We have a legitimate interest in processing your personal information.** Triller has a legitimate interest in processing your personal information for certain business and security purposes and to comply with applicable laws, including, but not limited to, the following:

- Services development, management, delivery and enhancement;
- Fraud detection and prevention;
- Network and system security;
- General corporate operations;
- User personalization;
- Compliance with applicable foreign laws;
- Communications regarding Services that you have already purchased; and
- Non-targeted marketing and advertising.

You have the right to object to our processing of your personal information based on our legitimate interests. You can do so by contacting us as described above. However, the
processing of some types of personal information is necessary to provide you the Services. Therefore, if you object to certain types of processing, we may not be able to provide you the Services.

**Processing is necessary for compliance with a legal obligation.** We will process personal information when necessary to comply with an obligation under EU or EU Member State law.

**Your Rights if You Are Located in the EU**

You have the right to request access to the personal information we have collected about you for the purposes of reviewing, modifying, or requesting erasure of the information. You also have the right to request a copy of the information we have collected about you. In certain situations, you may also request that we restrict or cease processing your information.

If you would like to make a request to access, review, or correct the personal information we have collected about you, please contact us at team@triller.co or through one of the methods in the How to Contact Us section, below.

To help protect your privacy and security, we will take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your information.

You will be notified of any actions taken on your personal information in response to a request submitted for modification, deletion, or restrictions on the processing of your personal information.

When data processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal. You also have a right to data portability when the data processing is based on your consent or a contract between you and Triller and the data was processed by automated means. You may exercise these rights by submitting a written request to the address listed below under How to Contact Us.

You have the right to lodge a complaint with the appropriate privacy or data protection regulator in your jurisdiction.

**How to Contact Us**

If you have any questions or comments about this Privacy Policy, please contact:

9737 Great Hills Trail, Suite 260
Austin, TX 78759

[team@triller.co](mailto:team@triller.co)

If you would like to update your contact information or preferences, have your information removed from our mailing lists, or no longer receive marketing e-mails, you may do so by:

- Adjusting the settings in an account you created through the Sites;
- Unsubscribing via the links contained in emails from us; or
Contacting us at team@triller.co.

**Last Revision Date**

This Policy was last revised on, and effective as of July 12, 2018.