

Sogasho Company Ltd Privacy Policy

SO, LTD. (the “Company” or “we”) respects your personal privacy and is committed to adhering to all applicable laws and industry guidelines relating to privacy and the protection of personally identifiable information. This privacy policy (“Privacy Policy”) describes how we handle the personally identifiable information that you provide to us via the mobile application and related websites, applications, and programs from the Company (together, the “Application”).

This Privacy Policy applies only to the Application, not to any other company or third party web sites that may be accessible or linked to from here. After reading this Privacy Policy, which is incorporated into and is a part of the Application’s End User License Agreement (“EULA”) you will know:

1. Information the Company collects from you
2. How the Company uses your information
3. How the Company protects your privacy
4. Third party websites
5. Your Rights and Choices
6. How you can contact the Company

Please be sure to carefully read this Privacy Policy before using the Application or submitting information to the Company. By (a) using any part of the Application; or (b) submitting information via the Application, you consent to the collection, use and distribution of such information by the Company for the purposes described in this Privacy Policy and as permitted or required by law.

This Privacy Policy may change from time to time and your continued use of the Application (following the posting of any revised Privacy Policy) is acceptance of such changes, so please check periodically for updates to this Privacy Policy.

This Privacy Policy does not apply to the practices of other companies that the Company does not own or control, or to individuals whom the Company does not employ or manage, including any third parties to which the Company may disclose user information as described in this Privacy Policy.

1. Information the Company Collects From You

Passive Information Collection

As you use the Application, certain information can be passively collected (that is, gathered without you actively providing the information) using various technologies and means, such as navigational data collection. Like most mobile application operators, we may track location information. Our system may also automatically gather information about your use of the Application and collects operational information about the technology you use, such as the type of mobile device you use, operating systems, and Internet service providers.

We passively collect and use information to generate statistics and measure activity in order to understand what areas of the Application are most popular, which areas may require improvement and what technologies our users are using. This information helps us to update and improve the Application and enhance the usefulness of customer visits. We also collect and use this information for security purposes, to detect and to block security breaches and to provide you with a safe online environment.

Active Information Collection

Like many other mobile applications, we actively collect information from our users during the registration process and by permitting you to communicate directly with us via the Application. The Company does not collect names, emails, addresses or other contact information from its users' mobile address book or contact lists other than mobile phone numbers—the Company mobile application will associate whatever name the user has assigned to the mobile telephone number in his/her mobile address book or contact list — and this occurs dynamically on the mobile device itself and not on Company servers and is not transmitted to Company.

User Provided Information: You provide certain Personally Identifiable Information, but not limited to your mobile phone number, push notification name (if applicable), billing information (if applicable) and mobile device information to the Company, when choosing to download, install, register as a user, and use the Application. In the provision the Application the Company will periodically access your mobile phone book or contact list on your mobile phone to locate the mobile phone numbers and other publicly available information related to the contacts in your contact list or phone book. The Company may use the information to categorize contacts based on whether or not they are a user of the Application, as “in-network” or “out- network” contacts,

Cache Memory: The Application may use "cache", a technology that installs information on a user's device to permit the Application to recognize future visits using that device. Cache memory enhanced the convenience and use of the Application. You may choose to decline or clear your cache if your device permits, but doing so may affect your use of the Application and your ability to access certain features of the Application.

Log File Information: When you use the Application, our servers log certain information that the Application sends whenever a message is sent or received, or if you update or request any status information, including time and date stamps and the mobile phone numbers the messages were sent from and to.

The Company does not collect names, emails, addresses or other contact information from its users' mobile phone book or contact lists other than mobile phone numbers. The Application will associate whatever username the Application user has assigned to the mobile telephone number in his/her mobile address book or contact list. This means that if you have your friend's mobile phone number saved under a pseudonym in your mobile address book, the pseudonym will appear for that contact or mobile phone number in your Application contact list. We do not collect location data, but users may voluntarily share their location with other users via the Application.

Your Personal Information: During your use of the Website, you may be asked to voluntarily provide certain personal information (such as your name, email address, postal address, and telephone number) for purposes such as facilitating communications with you.

Any Personally Identifiable Information or status content that you voluntarily disclose on the Application becomes publicly available and may be collected and used by other users of the Application (unless such user is blocked by you). Your name (as it is saved in other user's mobile phone book or contact list) may be displayed to other users when you update your status messages through the Application and other users may contact you through the Application.

2. How the Company Uses Your Information

Your use of the Application is conditional upon you consenting to the collection, use, or disclosure of personally identifiable information, as described in this Privacy Policy and the Application's EULA.

Non-personally identifiable data

We may use the non-personally identifiable, de-identified data or aggregated data we collect through the Application (collectively, the "De-Identified Data") for any purpose whatsoever, but this data will not identify any individual or include any Personally Identifiable Information. The Company is the sole owner of the De-Identified Data, and may copy, aggregate, distribute and otherwise use the De-Identified Data for any purpose.

We may send you information about our products and services and may contact you about new features or products in which we believe you may be interested. . Although the Company does not currently rent, sell, or otherwise share your information with third parties for purposes unrelated to the Application, it may do so in the future.

In the event of a sale, merger, liquidation or reorganization of the Company or in connection with a transfer of the assets related to the Application, we may transfer some or all of the information we maintain on you to the applicable successor(s), but such transfer will be subject to the terms of this Privacy Policy the Application's EULA.

We will also disclose any information that is required to be disclosed by law.

Use of Your Personal Information:

The Company collects and uses your Personally Identifiable Information to allow you to use the Application and allow the Company to contact you in response to any inquiries you make in connection with our products and services. We may share some or all of your personal information, as necessary, with agents and service providers who provide services or administer activities on our behalf, including data processing and storage, maintenance, payment processing and information technology services. We use contractual or other measures to restrict such agents and service providers from using your personal information in any manner other than as may be necessary to perform their services and to provide a level of security and privacy protection comparable to the security and privacy protection measures, we enact regarding your personal information.

We do not sell or share your Personally Identifiable Information (such as mobile phone number) with other third-party companies for their commercial or marketing use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out.

We may share your Personally Identifiable Information with third party service providers to the extent that it is reasonably necessary to perform, improve or maintain the Application.

The Company also reserves the right to disclose Personally Identifiable Information and/or non-personally-identifiable information that the Company believes, in good faith, is appropriate or necessary to enforce our EULA, take precautions against liability, to investigate and defend itself against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Application or our servers, and to protect the rights, property, or personal safety of the Application, our users or others.

Messages sent through the Application:

The contents of messages and communications that have been delivered by the Application are not copied, kept or archived by the Company in the normal course of business. The Application is meant to be a SMS replacement, using data service through a user's phone (either via cell network or Wi-Fi). Users type their messages, and/or attach media, which is sent via data service to our servers, and routed to the intended recipient (who must also be an Application user), if that recipient is online. If the recipient is not online, the undelivered message is held in the Company's server until it can be delivered. If the message is undelivered for thirty 15 days, the undelivered message is deleted from our servers. Once a message has been delivered, it no longer resides on our servers. The contents of any delivered messages are not kept or retained by the Company — the only records of the content of any delivered messages reside directly on the sender's and recipient's mobile devices (and which may be deleted at the user's option). Notwithstanding the above, the Company may retain date and time stamp information associated with successfully delivered messages and the mobile phone numbers involved in the messages, as well as any other information which the Company is legally compelled to collect. Files that are sent through the Application will reside on our servers after delivery for a short period of time, but are deleted and stripped of any identifiable information within a short period of time in accordance with our general retention policies.

3. How the Company Protects Your Information

We work hard to protect your Personally Identifiable Information.

The safety and security of your information also depend on you. Never share your password with anyone else and notify us promptly if you believe your password security has been breached.

The Company may store and process your personal information at the Company's office or through a third-party service provider. commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information, the Company employs security safeguards appropriate to the sensitivity of the information. Once we receive your transmission of information, the Company makes commercially reasonable efforts to ensure the security of our systems. Nevertheless, due to the nature of the Internet and Internet technologies, security and privacy risks cannot be eliminated and Company cannot guarantee that your personal information will not be disclosed in ways not otherwise described in this Policy. Using unsecured Wi-Fi or other unprotected networks to submit messages through the Application is never recommended.

4. Third Party Websites

The mobile device through which you access and use the Application and/or your cellular carrier may also be collecting other information about your use of their device and service. We do not control these third parties' tracking technologies or how they may use the information they collect.

The Application may contain links to other web sites operated by third parties that may be of interest to you. We cannot control these third-party web sites, which may collect personal information from you. We have no control over, and are not responsible for, the privacy practices or content of such web sites. When you follow a link and leave the Application, you do so at your own risk. If you would like information on another party's privacy policy, you should contact that party directly.

5. Your Rights and Choices

We store information until it is no longer necessary to provide our services, or until your account is deleted, whichever comes first. This is a case-by-case determination that depends on things like the nature of the information, why it is collected and processed, and relevant legal or operational retention needs.

If you would like to manage, change, limit, or delete your information, we allow you to do that through the following tools:

- **Services Settings.** You can change your Services settings to manage certain information available to other users. You can manage your contacts, groups, and channel lists, or use our block feature to manage the users with whom you communicate.
- **Changing Your Mobile Phone Number, Profile Name and Picture, And About Information.** You must change your mobile phone number using our in-app change number feature and transfer your account to your new mobile phone number. You can also change your profile name, profile picture, and about information at any time.
- **Deleting Your Account.** You may delete your account at any time (including if you want to revoke your consent to our use of your information) by sending an email request to **privacy@sosogasho.com** with your first name, last name, and the respective mobile number you would like for us to delete. We will send you in app message with a secret code to validate your identity and confirm your request("Unsubscribe"). Please note that we have the right to reject deletion requests that are unduly burdensome or repetitive or that cannot be honored in light of legal obligations or ongoing disputes, or where retention is necessary to enforce our agreements or protect our or another party's rights, property, safety, or security.

- When your account is deleted, your undelivered messages are deleted from our servers as well as any of your other information we no longer need to operate and provide our Services. Be mindful that if you only delete our Services from your device without requesting to delete the account by sending email request to **privacy@sosogasho.com**, your information may be stored with us for a longer period. Please remember that when your account is deleted, it does not affect the information other users have relating to you, such as their copy of the messages you sent them.

6. How You Can Contact the Company

If you have any questions about this Privacy Policy, the practices of the Company, or your dealings with the Company, or if you wish to know what personally identifiable information the Company is storing with respect to your use of the Application, you can contact us at: **privacy@sosogasho.com**

This Privacy Policy was last updated on **Friday, November 22, 2019**