

# Seven App Privacy Policy

Last Updated: 2024/05/16

Your privacy is very important to us at Seven ("Seven," "Seven App," "7," "we," "us" or "our"). This Privacy Policy is meant to help you understand what information we collect, why we collect it, if we share it with anyone, and how you can update, manage and delete your information. Please read below to see how the Seven App developer, doing business as Retrographic LLC ("Retrographic LLC"), handles information. Before you get to the details, here are a few of our fundamental privacy principles:

- Your privacy is critically important to us and we handle your information accordingly.
- We don't share your personal information with anyone without your consent, except to comply with the law, develop our products and services, to protect our rights.

Retrographic LLC respects your privacy and shares your concern about the security of data you may submit to Seven App's websites and the related mobile applications and services (collectively, the "Services"). Our privacy policy (the "Privacy Policy") explains the information we collect, how we use and protect it. This policy was written in English. To the extent a translated version conflicts with the English version, the English version controls.

Questions or comments about this Privacy Policy may be submitted by mail to the address below or via [seven@sprocket.bike](mailto:seven@sprocket.bike)

Attn: Legal - Retrographic LLC - 440 N Barranca Ave #7736 Covina, CA, USA 91723

Retrographic LLC recommends that you read the following contractual terms and conditions carefully.

- Our Privacy Policy explains how we and some of the companies we work with collect, use, share and protect information in relation to our mobile services, web site, and any software provided on or in connection with Seven App services (collectively, the "**Service**"), and your choices about the collection and use of your information.
- By clicking "I Agree", "Get Started" or using the Seven mobile application (the "App") and its accompanying data service (the "Service"), however accessed or used, You agree that you have read and understand the "Privacy Policy" as it relates to the Service provided for You (in either case, "You" or "Your") by Retrographic LLC, information we collect and the content you upload, post and share publicly and privately to our platform, including photos, text, comments, bicycle ads and other materials ("**User Content**"). By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. IF you provide Personal Data to the Services, you acknowledge and agree that such Personal Data may be

transferred from your current location to the servers of Retrographic LLC and the authorized third parties referred to in this Privacy Policy. This additionally means that other Users may search for, see, use, or share any of your User Content that you make publicly available through the Service, consistent with the terms and conditions of this Privacy Policy and our Terms of Use.

- Our Policy applies to all visitors, users, and others who access the Service ("**Users**").

IF YOU DO NOT UNDERSTAND THIS POLICY, OR DO NOT AGREE TO BE BOUND BY IT OR THE TERMS OF SERVICE, YOU MAY NOT ACCESS OR USE THE SERVICE AND YOU MUST IMMEDIATELY CEASE ACCESSING OR USING THE SERVICE.

## 1. WHAT KINDS OF INFORMATION DO WE COLLECT?

To provide the Seven App services, we must process information about you. The types of information Retrographic LLC collects, and how that information is used, depend on how you use our services and how you manage your privacy controls. We collect the following types of information:

When you're not signed in to a Google Account, we store the information we collect with unique identifiers tied to the browser, application, or device you're using. This helps us do things like maintain your language preferences across browsing sessions.

When you're signed in, we also collect information from your account, which we treat as your personal information.

### **Information you and others provide us directly**

- **Information and content you provide.** We collect the content, communications and other information you provide when you use Seven App, including when you message or communicate with Retrographic LLC. This can include information in or about the content you provide (like metadata), such as the location of a bicycle sale or the date a bicycle photo file was created. Note that you may not opt out of Service-related e-mails.
- **Email.** Your e-mail address when you contact us directly to provide feedback or ask for assistance (along with contents of the message and any attachments you may send to us, and other information you choose to provide)

- **Collections from children.** Seven App is not intended for use by children under the age of 13 and Retrographic LLC does not knowingly allow such persons to register for the Service. The Service and its content are not directed at children under the age of 13. Seven App does not knowingly collect or solicit any information from anyone under the age of 13. In the event that we learn that we have collected such personal information, we will delete that information . If you believe that we might have any information from or about a child under 13, please contact at seven@sprocket.bike or via the feedback form in the section of the mobile application or website at which to contact us.

#### **Device Information:**

- **Device attributes:** information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Identifiers:** unique identifiers, device IDs, and other identifiers, such as from apps or external accounts you use in Seven App. We also may collect information about the interaction of your apps, browsers, and devices with our services, including IP addresses, crash reports, system activity, and the date, time, and referrer URL of your request.
- **Cookie data:** If you give us permission to do so, when you visit the Services, data from our cookies stored on your device, including cookie IDs and settings can be used to collect information about how you use Seven App, provide features to you and personalize your experience. Seven App may also use this data to assist it in delivering content specific to your interests.

**Third party analytics information** We may receive additional information about you through the following data processors:

- **Google Play Console** - ( EU-U.S. and Swiss-U.S. Privacy Shield certified )
- **Google Firebase Console** - ( EU-U.S. and Swiss-U.S. Privacy Shield certified )

- **Google Play Store Console** The anonymized data collected and examined in aggregate by Google is done automatically and for every mobile application available on the Google Play Store and is maintained in accordance with Google's Privacy Policies respectively. Limited aggregate Google Data from your Android device may be available to you upon written request to Google or by visiting Google Takeout <https://takeout.google.com>

## **2. HOW WE USE THE INFORMATION WE COLLECT**

We use the information we have (subject to choices you make) as described below and to provide and build better Seven App services as described in our Terms of Service. Here's how:

### **Provide our services**

We use your information to deliver our services, like viewing basic analytics available in Play Store Console in order to optimize the app for you.

### **Maintain & improve our services**

We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues that you report to us. And we use your information to make improvements to our services – for example, understanding which screens the app is crashing on in order to identify the bugs causing those crashes and provide updates fixing them as quickly as possible or understanding if certain tasks are taking too long to complete and require an interface redesign to improve the feature for everyone.

### **Develop new services**

We use the information we collect in existing services to help us develop new ones. For example, understanding how and why people were searching bicycle factory specs in an early version of the Sprocket app, helped us design and launch the Sprocket marketplace for buying and selling bicycles.

### **Measure performance**

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design and the effectiveness of our service. We use a variety of tools to do this, including Google Play Console, Apple iTunes Connect Console and Google Firebase Console.

### **Communicate with you**

We use information we collect, like your email address, to respond to you when you contact us. If you contact Retrographic LLC to report inaccurate or inappropriate information on an item in Seven App, we'll keep a record of your request in order to help resolve the issue. Or we may let you know about upcoming changes or improvements to our services. Or send you push notifications related to your use of our Services.

### **Protect Retrographic LLC, Seven App users, and the public**

We use information to help improve the safety and reliability of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Retrographic LLC, Seven App users, or the public.

## **3. HOW WE STORE YOUR INFORMATION**

### **Storage and Processing:**

- Your information collected through the Service may be stored and processed in the United States or any other country in which Retrographic LLC, its Affiliates or Service Providers, maintain facilities.
- Seven App, its Affiliates, or Service Providers may transfer information that

we collect about you, including personal information across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction.

- By registering for and using the Service you consent to the transfer of information to the U.S. or to any other country in which Seven App, its Affiliates or Service Providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.
- We use commercially reasonable safeguards to help keep the information collected through the Service secure. However, Seven App cannot ensure the security of any information you transmit to Seven App or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed.
- Please do your part to help us. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and Seven App and Retrographic LLC, at all times. Your privacy settings may also be affected by changes the social media services you connect to Seven App make to their services. We are not responsible for the functionality, privacy, or security measures of any other organization.

#### **United States Operation:**

- The Services are operated from the United States. If you are located outside of the United States and choose to use the Services or provide information to us, your information will be transferred, processed and stored on Salesforce Heroku servers built on top of Amazon infrastructure in the United States. United States privacy laws may not be as protective as those in your jurisdiction. You acknowledge and consent to this practice.

## 4. HOW WE PROTECT YOUR INFORMATION

We take several measures to safeguard the collection, transmission and storage of the data we collect. These steps depend on the sensitivity of the data that we collect, process, and store. Although we strive to employ reasonable protections for your information that are appropriate to its sensitivity, we do not guarantee or warrant the security of the information you share with us and we are not responsible for the theft, destruction, loss or inadvertent disclosure of your information or content. No system is 100% secure.

### Disclaimer:

- While Seven App, doing business as Retrographic LLC, continues to work hard to protect your personal information, no data transmission over the Internet can be guaranteed to be absolutely secure, and Retrographic LLC cannot ensure or warrant the security of any information you transmit to Seven App. Transmitting personal information is done at your own risk.

## 5. YOUR INFORMATION PRIVACY CONTROLS

This section describes key controls for managing your privacy across our services.

At all times, we will provide you the following rights which you can exercise at any time by contacting us at [seven@sprocket.bike](mailto:seven@sprocket.bike)

- *The right to know whether your personal information is being collected*
- *The right to request the specific categories of information being collected*
- *The right to know what personal information is being collected about them*
- *The right to say "no" to the sale of personal information; we do not sell any of your personal information other than the sharing we state in this privacy policy.*
- *The right to delete your personal information*

**When you're signed out**, you can manage information associated with your browser or device.

### How long we keep your User Content:

- We retain information as long as it is necessary and relevant for our operations. Information about you that is no longer necessary and relevant for our operations will be disposed of. In addition, we may retain information from closed accounts to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the Services' terms and conditions and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.
- Following termination or deactivation of your account, Retrographic LLC, its Affiliates, or its Service Providers, may retain information (including your



profile information) and User Content for a commercially reasonable time for backup, archival, and/or audit purposes.

### **Removing and deleting your information**

- **You can delete your entire Google Account** through websites provided by these companies.
- **Collections from children.** Seven App is not intended for use by children under the age of 13 and Retrographic LLC does not knowingly allow such persons to register for the Service. The Service and its content are not directed at children under the age of 13. Seven App does not knowingly collect or solicit any information from anyone under the age of 13. In the event that we learn that we have collected such personal information, we will delete that information. If you believe that we might have any information from or about a child under 13, please contact us immediately at seven@sprocket.bike or via feedback form in the section of the mobile application or website at which to contact us.

**There are other ways to control the information** collected whether or not you're signed in to your Google Account, including:

- **Browser settings:** For example, you can configure your browser to indicate when Retrographic LLC has set a cookie in your browser. You can also configure your browser to block all cookies from a specific domain or all domains.
- **Device-level settings:** Your device may have controls that determine what information we collect. For example, you can modify your location settings on your Android device.

### **6. YOUR INFORMATION PRIVACY CONTROLS IN REGARDS TO OTHER WEB SITES AND SERVICES**

We are not responsible for the practices employed by any websites or services linked to or from our Service, including the information or content contained within them.

Please

remember that when you use a link to go from our Service to another website or service, our Privacy Policy does not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link on our mobile app or website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service and you allow them to access your User Content you do so at your own risk.

If you have questions in regards to any matters relating to your use of any other web sites or services linked to our service, you must follow contact directions on those other sites to address your customer service issues.

## **7. SHARING OF YOUR INFORMATION**

### **When you share your information**

You may choose to share your or our data outside the Services. If you choose to share or post your location information or any other information via such third parties, it is possible that unintended people could have access to such information. You should use caution when sharing information via third parties and you should carefully review the privacy practices of such third parties.

#### **Sharing within Retrographic LLC:**

- We may share your information and content within Retrographic LLC to operate, improve or promote the Seven App mobile and website Services.

#### **We may share information with third parties:**

We work with third-parties and other integration partners who help us provide a more feature-rich service to you, and may provide us with revenue to offset our service operating expenses. We will not rent or sell your information to third parties outside Retrographic LLC without your consent, except as noted in this Policy.

- **Third Party Services.** We also may share your information as well as information from tools like cookies, log files, and device identifiers and location data, with third-party organizations that help us provide the Service to you ("Service Providers").
- **Service providers.** We work with third party service providers to perform services on our behalf, and we may share your information with such service providers to help us provide the Seven App Platform, including all of the things described in Sections above.
- **Change of ownership.** While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets.
- **Government information request.** If a government authority requests information and we think disclosure is required or appropriate in order to

comply with laws, regulations, or a legal process.

- **Harm prevention.** With law enforcement officials, government authorities, or third parties if we think doing so is necessary to protect the rights, property, or safety of the Seven App community, Seven App, Retrographic LLC, or the public.
- **Legal compliance.** To comply with a legal requirement or process, including but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures.
- **Business partnerships.** To provide information about the use of the Seven App platform to potential business partners we may remove parts of data that can identify you and/or combine your information with other information in a way that it is no longer associated with you and share that aggregated or de-identified information in a form that can't reasonably be used to identify you.

#### **Unforeseeable Disclosures:**

- Your personally identifiable information may be disclosed to third parties in unforeseeable situations that are not preventable even when commercially reasonable protections are employed, such as in the case that Seven App or the Services or Retrographic LLC is subject to a hacking or other attack.

#### **What happens in the event of a change of control:**

- If we sell or otherwise transfer part or the whole of Seven App or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address, User Content and any other information collected through the Service may be among the items sold or transferred. You will continue to own your User Content. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

#### **Responding to legal requests and preventing harm:**

- We may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

- We may also disclose your information if we determine that the disclosure is reasonably necessary to prevent or detect violations of our Terms of Service or fraud or abuse of Seven App or Retrographic LLC or its members, or to protect our operations or our property or other legal rights, including by disclosure to our legal counsel and other consultants and third parties in connection with actual or potential litigation.

## **8. ADDITIONAL CHOICES FOR CALIFORNIA RESIDENTS**

If you are a California resident, you may request and obtain from us, once a year, free of charge, a list of third parties, if any, to which we disclosed your PII (such as your name and contact information) for direct marketing purposes during the preceding calendar year and the categories of PII shared with those third parties. If you are a California resident and would like to request a copy of that information, please send us an email at [seven@sprocket.bike](mailto:seven@sprocket.bike) with "California Privacy Rights" in the subject line or a letter with Attention: Privacy to Retrographic LLC 340 S Lemon Ave #7736 Walnut, CA 91789 United States

## **9. HOW TO CONTACT US**

If you have any questions about this Privacy Policy or the Service, please email us at [seven@sprocket.bike](mailto:seven@sprocket.bike) or use the feedback form in the help section of the mobile application or website at which to contact us.

## **10. CHANGES TO OUR PRIVACY POLICY**

Internet technology and the applicable laws, rules, and regulations change frequently. ACCORDINGLY, RETROGRAPHIC LLC RESERVES THE RIGHT TO CHANGE THIS AGREEMENT AND ITS PRIVACY POLICY AT ANY TIME UPON NOTICE TO YOU, TO BE GIVEN BY THE POSTING OF A NEW VERSION OR A CHANGE NOTICE. IT IS YOUR RESPONSIBILITY TO REVIEW THIS AGREEMENT AND THE PRIVACY POLICY PERIODICALLY. IF AT ANY TIME YOU FIND EITHER THIS POLICY OR THE TERMS OF SERVICE UNACCEPTABLE, YOU MUST IMMEDIATELY CEASE ACCESSING AND/OR USING THE SERVICE. Unless Retrographic LLC obtains Your express consent, any revised Privacy Policy will apply only to information collected by Retrographic LLC after such time as the revised Privacy Policy takes effect, and not to information collected under any earlier Privacy Policies. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of Seven App or the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.

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