

Privacy Policy

nēdl.com Inc.

Hay! Welcome to the website (the “**Site**”) of nedl.com Inc., Inc. (dba “nēdl”), (“**Company**,” “**we**,” “**us**,” or “**our**”). Through our mobile application (the “**App**”), we allow users to host, join and otherwise engage with live call-in radio shows and conversations with people from around the world (such services, including <https://www.nedl.com> (the “**Site**”) and the App, are referred to collectively in this Privacy Policy as the “**Service**”).

This Privacy Policy explains what Personal Data (defined below) we collect, how we use and share that data, and your choices concerning our data practices. This Privacy Policy is incorporated into and forms part of our [Terms of Service](#).

Before using the Service or submitting any Personal Data to Company, please review this Privacy Policy carefully and contact us if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Site or otherwise use the Service.

1. PERSONAL DATA WE COLLECT

We collect information that alone or in combination with other information in our possession could be used to identify you (“**Personal Data**”) as follows:

Personal Data You Provide: We collect the following categories of Personal Data from you when you use our Service, including when you sign up for an account, create or share content, and message or communicate with others:

- **Information you provide:** We collect content, communications, and other information you provide, including when you sign up for an account, create or share content, and message or communicate with others. To create and manage an account, you may provide us with personal data, including your name, phone number, a photo of yourself, an email address, and a username. We use your contact information to authenticate your account and keep it secure and to communicate with you about the Service
- **Audio:** Solely for the purpose of supporting incident investigations, we temporarily record the audio in a room while the room is live. If a user reports a Trust and Safety violation while the room is active, we retain the audio for the purposes of investigating the incident, and then delete it when the investigation is complete. If no incident is reported in a room, we delete the temporary audio recording when the room ends. Audio from (i) muted speakers and (ii) audience members is never captured, and all temporary audio recordings are encrypted.

- **Networks and connections:** We collect information about the people, accounts, and groups you are connected to and how you interact with them through our Service. We use your contact information and (if you choose to provide us with access to it), your address book information to recommend other users and content and to recommend your account and content to others.
 - **Usage:** We may choose to collect information about how you use our Service, such as the types of conversations you engage in, content you share, features you use, actions you take, people or accounts you interact with, and the time, frequency, and duration of your use.
 - **Communication Data:** We may choose to collect information when you contact us with questions or concerns and when you voluntarily respond to requests for your opinion and feedback.
 - **Social Media Data:** We have pages on social media sites like Instagram, Facebook, Medium, Twitter, Tiktok, and LinkedIn (“**Social Media Pages**”). When you interact with our Social Media Pages, we will collect Personal Data that you elect to provide to us, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.
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Internet Activity Data: When you visit, use, and interact with the Service, we may receive certain information about your visit, use, or interactions. For example, we may monitor the number of people that visit the Service, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access the Service (e.g., Chrome, Firefox, Microsoft Internet Explorer, etc.), broad geographical information, and navigation patterns. In particular, the following information is created and automatically logged in our systems:

- **Log Data:** Information that your browser automatically sends whenever you visit the Site. Log Data includes your Internet Protocol address, browser type and settings, operating system, the date and time of your request, how you interacted with the Site, and how you interacted with mobile or email notifications.
- **Cookies Data:** Please see the “Cookies” section below to learn more about how we use cookies.
- **Device Data:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Data:** We collect information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities.
- **Location Data:** We derive a rough estimate of your location from your IP address.
- **Email Open/Click Data:** We may use pixels in email campaigns that allow us to collect your email and IP address as well as the date and time you open an email or click on any links in the email.

Internet Activity Data: When you visit, use, and interact with the Service, we may receive certain information about your visit, use, or interactions. For example, we may monitor the number of people that visit the Service, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access the Service (e.g., Chrome, Firefox, Microsoft Internet Explorer, etc.), broad geographical information, and navigation patterns. In particular, the following information is created and automatically logged in our systems:

- **Log Data:** Information that your browser automatically sends whenever you visit the Site. Log Data includes your Internet Protocol address, browser type and settings, operating system, the date and time of your request, and how you interacted with the Site.
- **Cookies Data:** Please see the “Cookies” section below to learn more about how we use cookies.
- **Device Data:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Data:** We collect information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities. We only store audio from conversations if a user reports an incident during a conversation; otherwise all audio is deleted.
- **Email Open/Click Data:** We may use pixels in email campaigns that allow us to collect your email and IP address as well as the date and time you open an email or click on any links in the email.

Personal Data Collected from Third Parties/Publicly Available Sources:

When you create your account, and/or authenticate with a third-party service like Twitter, we may collect, store, and periodically update information associated with that third-party account, such as your lists of friends or followers. We will never publish something through one of your third-party accounts without your express permission.

Derived Data: We may infer your preferences for content and features of the Service, or future products and services, based on the Personal Data we collect about you.

Cookies: We may use cookies to operate and administer our Site, gather usage data on our Site, and improve your experience on it. “Cookies” are small text files containing a string of characters that can be placed on your computer or mobile device that uniquely identifies your browser or device. Cookies can be stored on your computer or mobile device for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and help recognize your computer or mobile device when you open your browser and browse the Internet again (persistent cookies).

Cookies and other technologies allow a site or services to know if your computer or device has visited it before. These technologies can then be used to deliver products, services, and ads, help us understand how the site or service is being used, help you navigate between pages efficiently, help remember your preferences, and generally improve your experience in using our services. If you limit the ability of websites to set cookies, you may be unable to access certain parts of the Site and you may not be able to benefit from the full functionality of the Site.

Advertising networks may use cookies to collect Personal Data. Most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit the Network Advertising Initiative's online resources at <http://www.networkadvertising.org> and follow the opt-out instructions there.

If you access the Site on your mobile device, you may not be able to control tracking technologies through the settings.

Analytics: We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this data, go to www.google.com/policies/privacy/partners/.

Online Tracking and Do Not Track Signals: We and our third party service providers may use cookies, pixels, or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site and use that information to send targeted advertisements. We make reasonable commercial efforts to recognize and support "Do Not Track" signals.

2. HOW WE USE PERSONAL DATA

We may use Personal Data for the following purposes:

- To provide the Service;
- To create your account, facilitate network connections, recommend content, and further personalize the Service for you;
- To respond to your inquiries, comments, feedback, or questions;
- To send administrative information to you, for example, information regarding the Service and changes to our terms, conditions, and policies;
- To analyze how you interact with our Service;
- To maintain and improve the Service;
- To develop new products and services;
- To authenticate your account and keep it secure;
- To enforce our Terms of Service;
- To prevent spam, fraud, abuse, criminal activity, or misuses of our Service, and to ensure the security of our IT systems, architecture, and networks; and

- To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.

Aggregated Information. We may aggregate Personal Data and use the aggregated information to analyze the effectiveness of our Service, to improve and add features to our Service, and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Service and share aggregated information like general user statistics with prospective business partners. We may collect aggregated information through the Service, through cookies, and through other means described in this Privacy Policy.

3. SHARING AND DISCLOSURE OF PERSONAL DATA

Company does not sell your Personal Data. In certain circumstances we may share the categories of Personal Data described above without further notice to you, unless required by the law, with the following categories of third parties:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may share Personal Data with vendors and service providers, including providers of hosting services, audio applications and infrastructure, cloud services, and other information technology services providers, event management services, email communication software and email newsletter services, advertising and marketing services, payment processors, customer relationship management and customer support services, and web analytics services. Pursuant to our instructions, these parties will access, process, or store Personal Data in the course of performing their duties to us. We take commercially reasonable steps to ensure our service providers adhere to the security standards we apply to your Personal Data.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider (collectively a “Transaction”), your Personal Data and other information may be shared in the diligence process with counterparties and others assisting with the Transaction and transferred to a successor or affiliate as part of that Transaction along with other assets.
- **Legal Requirements:** If required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users of the Service, or the public, or (v) protect against legal liability.
- **Affiliates:** We may share Personal Data with our current and future affiliates, meaning an entity that controls, is controlled by, or is under common control with Company. Our affiliates may use the Personal Data we share in a manner consistent with this Privacy Policy.

- **Other Users:** certain actions you take may be visible to other users of the Service. For example, when you upload profile photos or update information in your profile, other users will have access to this content and information.
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4. DATA RETENTION

We keep Personal Data for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a business need to do so, or as required by law (e.g. for tax, legal, accounting, or other purposes), whichever is longer. We give each user the ability to dissociate their personal identifying information from any and all transcriptions in our database at any time after the broadcast has ended. When information is ‘deleted’ their words are no longer associated with their account, no longer available or attributable in search results, and finally stored in alphabetical order.

5. UPDATE YOUR INFORMATION

Please log in to your account or contact us (at support@findnedl.com) if you need to change or correct your Personal Data, or if you wish to delete your account.

6. CALIFORNIA PRIVACY RIGHTS DISCLOSURES

Where provided for by law and subject to any applicable exceptions, California residents may have the right:

- To know the categories of Personal Data that Company has collected about you, the business purpose for collecting your Personal Data, and the categories of sources from which the Personal Data was collected;
- To access the specific pieces of Personal Data that Company has collected about you;
- To know whether Company has disclosed your Personal Data for business purposes, the categories of Personal Data so disclosed, and the categories of third parties to whom we have disclosed your Personal Data;
- To have Company, under certain circumstances, delete your Personal Data;
- To opt out: we may share Identification Data and Internet Activity Data with social media platforms and other advertising partners that will use that information to serve you targeted advertisements on social media platforms and other third party websites – under certain regulations such sharing may be considered a “sale” of Personal Data; and
- To be free from discrimination related to the exercise of these rights.

If you would like to exercise any or all of these rights, you may do so by contacting us at support@findnedl.com. Your authorized agent may submit requests in the same manner. Once we receive your request, we will verify your identity by sending an email to the email address you provide to us.

Please contact us if you have questions about your rights or our disclosures under the CCPA, or to request access to an alternative format of this Privacy Policy.

7. CHILDREN

Our Service is not directed to individuals who are under the age of 12. Company does not knowingly collect Personal Data from individuals under the age of 12. If you have reason to believe that an individual under the age of 12 has provided Personal Data to Company through the Service please contact us and we will endeavor to delete that information from our databases.

8. LINKS TO OTHER WEBSITES

The Service may contain links to other websites not operated or controlled by Company, including social media services (“Third Party Sites”). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

9. SECURITY

You use the Service at your own risk. We implement commercially reasonable technical, administrative, and organizational measures to protect Personal Data both online and offline from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Service or e-mail. Please keep this in mind when disclosing any Personal Data to Company via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service, or third party websites. Finally, we cannot control the actions of users on the platform, who may seek to use third party apps or devices to record, store, or share content or communication without other users' prior consent. Please keep this in mind when using the Service.

10. INTERNATIONAL USERS

By using our Service, you understand and acknowledge that your Personal Data will be transferred from your location to our facilities and servers in the United States, and where applicable, to the servers of the technology partners we use to provide our Service.

11. YOUR CHOICES

In certain circumstances providing Personal Data is optional. However, if you choose not to provide Personal Data that is needed to use some features of our Service, you may be unable to use those features. You can also contact us to ask us to update or correct your Personal Data. You may also delete your account. Please note that we will need to verify that you have

the authority to delete the account and certain activity generated prior to deletion may remain stored by us and may be shared with third parties as detailed in this Privacy Policy.

12. CHANGES TO THE PRIVACY POLICY

The Service and our business may change from time to time. As a result we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use our Service or providing us with Personal Data after we have posted an updated Privacy Policy, or notified you by other means if applicable, you consent to the revised Privacy Policy and practices described in it.

13. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us anytime via e-mail at support@findnedl.com.

Thank you!