

ManyMe™ Privacy Policy

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Your privacy is critically important to us!

ManyMe has a few guiding principles:

- We don't ask you for personal information unless we truly need it to operate our service, for example, your primary email address for the delivery of email and credit card information as may be necessary to subscribe to our Premium service.
- We don't share your personal information with anyone, except as may be necessary to comply with the law or protect our rights.
- We don't sell your personal information to anyone.
- We don't store your email, except as necessary to (i) deliver our services as described on our website and in our user materials, for example, to quarantine messages and host attachments, (ii) conduct pre-release testing, (iii) comply with your instructions when configuring our service, and (iv) troubleshoot technical support questions and operational issues, and in all of these cases, for as short a period of time as necessary.
- We do store data about your email, such as email header information, but only as necessary to troubleshoot issues and provide you with useful information about your email experience, for example, to inform you about the propagation of your email addresses or the volume of email received on a specific address over a period of time.
- We use aggregated, non-identifying user information to improve the effectiveness of our services, develop new services, and contribute to the broader online security community.

It is our commitment to collect only such information as is necessary or appropriate to fulfill the purpose of your interaction with ManyMe, and to respect your privacy regarding the information that is collected.

The following privacy statement seeks to incorporate these principles.

1. What we collect

1.1 Personal information. Personal information refers to any information that identifies you personally. In this regard, we collect your primary email address and your ManyMe username and password when you create an account to use ManyMe.com. Personal information can also include information about you that can be gleaned from your use of the internet, social media sites, and service providers, which information may be used to display appropriate advertising in an advertising-supported service, if any, as distinct from ManyMe's fee-based subscription service.

1.2 Email information. In filtering, processing and delivering emails for our users, we retain a range of information about each email, including email header information such as the date and time of receipt, the address of the sender, the FlyBy address to which the message is

sent, the subject line, and the status of our processing steps, among other information. This information is retained in company databases and much of it in each user's private portal. Emails that successfully pass ManyMe's layered filtering steps are delivered to the user's inbox, and the content of the message body is not retained. Messages that are placed in the user's quarantine and attachments that are hosted in the ManyMe Cloud are retained for a reasonable period of time, and at most for 90 days, for the convenience of the user.

1.3. Navigational information. Like many operators of websites and cloud-based services, ManyMe collects and analyzes information that web browsers and servers make available automatically, such as your computer operating system, your browser type, language preference, the website you visited before browsing to our site, and your Internet Protocol (IP) address, for the purpose of identifying your country-level geographic location. We also capture the date, time and duration of each visit, your navigation through the site, the pages you viewed, and how long you spent on a page, and similar statistics that help us improve the design of our sites and services.

1.4 Payment information. We collect and process payment information from you when you subscribe to ManyMe's fee-based subscription services, including credit card numbers and billing information, using PCI-compliant service providers.

1.5 Cookies. A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. ManyMe may use both Session Cookies (which expire once you close your web browser) and Persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal, tailored and useful experience when you engage with ManyMe's services and sites. Visitors to ManyMe's website and users of ManyMe's services who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using ManyMe's websites or services, with the drawback that certain features of ManyMe's websites or services may not function properly without the aid of cookies.

1.6 Aggregated user data. ManyMe collects, aggregates and analyzes information about our users' experiences with email senders, internet domains and websites, such as IP addresses that are observed sending spam and viruses, domains from which email addresses appear to be propagating to other domains, and the volume of email received over time as a result of an address disclosure. The collection and analysis of this information does not reveal any information about specific users.

2. How we use the information we collect

2.1 Compliance with our privacy policy. We use the information that we collect only in compliance with this Privacy Policy.

2.2 Use of personal information. We will never sell your personal information to any third party. We use your ManyMe username and password to provide access to your ManyMe personal portal, and we direct email that is processed by ManyMe to the inbox associated with

your primary email address. We may also use other personal information obtained from third parties to guide the display of suitable advertising in an advertising-supported service, if one is offered. ManyMe takes reasonably necessary measures to protect against the unauthorized access, use, alteration or destruction of personally-identifying and potentially personally-identifying information.

2.3. Use of email information/content. As noted previously, most of the email processed by ManyMe.com is filtered for safety and delivered to the user's primary email inbox, not stored on ManyMe's servers. ManyMe only retains the body of user emails and attachments, as necessary to (i) deliver our services as described on our website and in our user materials, for example, to quarantine messages and host attachments, (ii) conduct pre-release testing, (iii) comply with your instructions when configuring our service, and (iv) troubleshoot technical support questions and operational issues, and in all of these cases, for as short a period of time as necessary. ManyMe is not responsible for the content of user emails that may contain personal, sensitive or illegal information about the user or another party.

2.4 Use of navigational information. Like many operators of websites and cloud-based services, ManyMe uses navigational information to improve the design of its sites and services and provide a more personal, tailored experience for users. However, ManyMe does not use such information to identify its visitors in any kind of a personal manner, and does not disclose such information.

2.5. Use of payment information. If you give us credit card information, we use it solely to collect payment from you. We use third-party service providers to manage credit card processing. We do not authorize these service providers to store, retain or use information you provide except for the sole purpose of credit card processing on our behalf.

2.6 Use of Cookies. ManyMe uses cookies or similar technologies to analyze trends, administer its websites, track users' movements around the website, and to gather demographic information about the ManyMe user base as a whole. In turn we use this information to provide a more personal, tailored experience for users of our websites and services. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you wish. If you choose to decline cookies, your experience with our websites and services may not be as robust and functional as would otherwise be the case.

2.7 Use of aggregated user data. ManyMe uses aggregated user data to (i) improve the delivery of its services for all of its users, (ii) publish statistics about topics such as the spread of email addresses from one website to others ("address propagation") and the senders that are most frequently blocked by ManyMe users, (iii) develop IP address reputation data, as a means of identifying and blocking risky sites to protect ManyMe users, (iv) create new services, and (v) contribute to the broader security community for the benefit of all online users, and for similar purposes.

2.8 Data accessible by ManyMe employees. ManyMe employees, contractors and affiliated organizations may have access to personally-identifying and potentially personally-

identifying information only insofar as those people or entities (i) need to know such information in order to process it on ManyMe's behalf or to provide ManyMe's services, and (ii) have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using ManyMe's websites or services, you consent to the transfer of such information to them.

2.9 External websites. The ManyMe website provides links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

2.10 International transfer of information. To facilitate global operations, ManyMe may transfer and access personal information from around the world, including the United States. This Privacy Policy shall apply even if we transfer personal information to other countries.

2.11. Retention of Personal Information. We retain Personal Information that you provide to ManyMe as long as it is necessary to deliver our services to you, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements. If there has not been any activity in your ManyMe account for 12 consecutive months, ManyMe reserves the right to terminate your account and delete all of your data.

3. Corporate Transactions. If ManyMe or its assets are acquired by another company, whether by merger, acquisition, bankruptcy, or otherwise, that company would receive all Personal Information and other information gathered by ManyMe on its websites and in the delivery of its services. In this event, you will be notified via email and by a prominent notice on our websites of any changes in ownership, uses of your information, and choices that you may have regarding your information.

4. Compelled disclosure. We reserve the right to use or disclose your Personal Information and other information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others or the public at large, investigate fraud, or comply with a law, court order, or legal process.

5. Advertising. ManyMe partners with third-party ad networks to either display advertising on our website or to manage advertising on other sites. Our ad network partners use cookies and web beacons to collect non-personal information about your activities on ManyMe and other websites to provide you with targeted advertising based on your interests. If you wish not to have this information used for the purpose of serving you targeted ads, you may opt-out. Please note that if you opt-out of targeted advertising, you will continue to receive generic ads.

6. Anti-spam and anti-malware policy. You are prohibited from using either our advertising-supported services or our fee-based subscription services to send (i) unsolicited commercial email in violation of applicable laws, (ii) viruses or other malicious software, and (iii) other

illegal material. Any violations of this policy can result in immediate suspension or termination of all ManyMe services for the offending user.

7. Contact Via Email. If you are a registered user of ManyMe’s services or have registered on a ManyMe website to receive information and have supplied your email address for this purpose, ManyMe may occasionally send you email to tell you about new features, solicit your feedback, conduct market research, keep you informed about security and privacy topics, or to keep you generally up-to-date with what’s going on with ManyMe and our services. We expect to keep this type of email to a minimum.

8. Privacy Policy Changes. ManyMe may change its Privacy Policy from time to time, and in ManyMe’s sole discretion. Therefore, ManyMe encourages visitors to its websites and users of its services to check this page frequently for any changes.

9. Questions. If you have questions about this Privacy Policy or our treatment of the information you provide to us or we collect, please send us an email at privacy@manyme.com.

ManyMe.com

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