PRIVACY POLICY

Last revised October 29, 2026

This Privacy Policy describes the categories of information that Perry Street Software ("Perry Street", "we", "our," or "us") (see Contact Information below) collects from visitors to and users of any of the websites at https://www.scruff.com, https://www.jackd.com, https://www.growlr.com, https://shop.scruff.com/, or https://www.perrystreet.com (each, a "Website" and collectively, the "Websites"), any mobile or web application of ours (each, an "App" and collectively, the "Apps") and any other services or products of ours (the Websites, the Apps and such other services and products are collectively referred to hereinafter as the "Service") and how we use it, how we disclose it, how we protect it, your choices regarding it (see Your Choices Regarding Your Information below) and your rights (see Your Rights and Retention below). The information we collect and the purposes for which we use or disclose it will depend to some extent on how you use the Service and how you interact with us. Throughout this Privacy Policy, "information" includes personal information about you.

Please read this Privacy Policy and the Terms of Service ("TOS") carefully. If you do not agree with the terms of this Privacy Policy or our TOS, do not use or visit the Service. By using or visiting Service, you agree to the terms of this Privacy Policy and our TOS.

CONTACT INFORMATION

Perry Street Software, Inc.
929 Alton Road, Ste 500
Miami Beach, FL 33139

Legal inquiries: legal@perrystreet.com

For any data requests, deletion requests, or GDPR-related requests, or questions regarding this Privacy Policy, you may submit a support request at https://support.scruff.com, https://support.jackd.com, or https://support.growlr.com.

INFORMATION WE COLLECT

1. You may voluntarily provide us with information, including:

- Service information, such as your real name, alias, email address, mailing address, telephone number, date of birth, profile name, profile photo, account name, credentials and other information, picture, height, weight, occupation, education, physical characteristics or description, gender identity, preferred pronouns, HIV status and other health details, ethnicity, personal interests, relationships and preferences, residence information, listing address and details for residential and other properties, rooms, accommodations, travel plans and information, products and services you have purchased or are considered purchasing, other social networking service or other service user names, payment card numbers and other payment information, a profile name and password that you create and any other information to register for and to use the Service.

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- While you may voluntarily provide us with sensitive information about yourself such as your gender identity, ethnicity, personal interests, relationships and preferences, health details and whether part of the POZ (HIV positive) community (for example, in creating or updating your profile), there is no requirement to do so. Where you choose to provide us with such sensitive information, you are explicitly consenting to our processing of your information. Please also see our Consumer Health Data Privacy Notice at https://www.perrystreet.com/legal/health-privacy.
- You may choose to provide and/or we may request that you provide certain information which may be considered sensitive information, namely, biometric data, in some jurisdictions, to obtain a verification badge for a profile in the former instance, and/or in connection with the process of verification, which you can decline to provide, in the latter instance. In each of the former and latter instances, please see our Notice and Consent to Process Biometric Data at https://www.perrystreet.com/legal/biometric.
- Where you choose to provide us with other sensitive information in connection with your use of the Service such as payment information, account credentials, and contents of any public or private messages and/or comments you transmit through the Service, including without limitation, with other users, you are explicitly consenting to our processing of your information.
- You may voluntarily provide us with additional information such as audio recordings (for example, audio clips) and/or other information you provide when you contact or otherwise interact with us or a service provider, third party and/or other party (for example, regarding support or employment opportunities and participating in surveys).

2. We can automatically collect hardware and software information from or about you and your computer or mobile device, as applicable, including:

- An identifier that is unique to the device on which you install the Service and some device identifiers may be persistent device identifiers;
- Advertising identifiers;
- Operating system;
- Browser type;
- Mobile network information;
- The make, model and serial number of your device;
- Your Internet Protocol (IP) address;
- Domain name of your Internet service provider;
- Platform type;
- The Service pages that you visit and the date and time of your visits;
- Information regarding your access to and use of the Service;
- Information regarding Service crashes;
- Anonymized information;
- A history of your prior geographic locations; and
- Your current geographic location.

We ask for your consent to access your geographic location information, which may be considered sensitive information. If you allow such access, we collect your geographic location to determine your distance from other users through GPS, Wi-Fi and/or cellular technology in your device. You may change such access to geographic location information via the settings on your device. Your last known geographic location can be stored for the purpose of calculating your distance from other users. If you do not allow such access, you may not be able to use all portions or all functionality of the Service. Prior to your installation of the Service, we may have already collected

information about the other apps or services that you have used via our service providers, third parties and/or other parties.

We automatically collect certain information that is generated through your use of the Service, including information about the profiles that you have viewed, the products and services you have purchased or considered purchasing through the Service and how you communicate with other users.

We can automatically collect such information via use cookies, Web beacons, persistent device identifiers, advertising identifiers and other technologies. Please see Cookies and Other Technologies; Do Not Track below.

3. We also can derive information or draw inferences about you based on information we collect from or about you to create a profile about you reflecting your inferences drawn from any of the foregoing information to create a profile about you reflecting your preferences, characteristics, predispositions, behavior and attitudes.

4. We can collect information about you from:

- publicly accessible sources;
- users; and
- our service providers, third parties and/or other parties;

5. We can combine any of the information we collect from or about you and use it and disclose it in the manner described in this Privacy Policy.

6. We can supplement any of the information we collect from or about you with other information.

Please see How We Can Use Your Information, How We Can Disclose Your Information, Cookies and Other Technologies; Do Not Track, Your Choices Regarding Your Information, Your Rights and Retention below.

HOW WE CAN USE YOUR INFORMATION

We can use the information that we collect from and about you to conduct our business and for any of the purposes described in this Privacy Policy, subject to applicable law. Examples are as follows.

1. To Provide You with Services and Products. To provide or facilitate providing you with services and products (for example, the Service), including to process, manage, maintain and service your registered account and your profile, to fulfill your transactions , to ship your products and services, and to process your payments.

2. To Allow You to Participate in Interactive Features on the Service.

3. For Travel Recommendations and Features. To make travel-related recommendations and enable travel-related features.

4. To Administer and Troubleshoot the Service.

5. To Communicate with You. To communicate with you to provide information, Service-related notifications, promotions and recommendations, including, without limitation, based on

information you provide in your profile such as community identifications (including those related to health details and gender identity), sex preferences, and safer-sex practices.

6. To Respond to You. To respond to you, such as when you make a request or an inquiry or provide us with comments, and to provide you with support.

7. For Personalization and Enhancement of Your Experience Using the Service. For personalization and enhancement of your experience using the Service, including to remember your interests and preferences, customize our products and services that we provide you with, facilitate your interactions with us and track and categorize your activity and interests on the Service.

8. For Marketing and Advertising. For marketing and advertising, such as to send you marketing and advertising communications and to show you marketing and advertising on the Service. For example, an advertiser can engage Perry Street directly to present you with an advertisement on the Service. We can also run advertising on other websites, applications and services via our advertising display partners.

9. To Conduct Service Provider, Third Party and/or Other Party Promotions.

10. For Analytics. For analytics, including to understand how you use the Service, determine how you access the Service and improve the Service.

11. For Our Business Purposes. For our business purposes, such as to operate and improve upon our business and lawful business activities, to maintain our accounts and records; for research, to determine your satisfaction with our services and products (for example, the Service), to detect and prevent fraud or misuse of our services and products and for any other business purpose that is permitted by applicable law.

12. Surveys and Research. To create and/or administer surveys and conduct research of user behavior.

13. To Improve the Service and To Develop New Services and Products. To improve the Service and to develop new services and products.

14. For Legal and Safety Purposes. For legal and safety purposes, including to defend or protect us, you or others, from harm or in legal proceedings, protect our rights, protect our security and the security of others and property, respond to court orders, lawsuits, subpoenas and government requests, address legal and regulatory compliance, enforce our TOS and notify you of safety issues.

15. Anonymized Information. For collecting, compiling and/or creating anonymized information, which we or a service provider, third party and/or other party can do, subject to applicable law, and which we or a service provider, third party and/or other party can use for any purpose, subject to applicable law.

16. With Your Consent. We can use your information other than as described in this Privacy Policy if we notify you and you consent to such use, except as otherwise expressly provided in Your Rights-Cross-Border Transfers below, and subject to applicable law.

17. At Your Request. We can use your information at your request, subject to applicable law.

18. For Any Other Purpose with Notice by Us. We can use your information for any other purpose for which we provide you with notice, subject to applicable law.

19. Cookies and Other Technologies; Do Not Track. Please see Information We Collect above and Cookies and Other Technologies; Do Not Track below.

Please also see Information We Collect above and How We Can Disclose Your Information, Cookies and Other Technologies; Do Not Track, Your Choices Regarding Your Information, Your Rights and Retention below.

WHERE WE PROCESS AND STORE YOUR INFORMATION

We store the information that we collect on our systems. If you are located outside of the United States, please note that the Service is hosted on our systems in the United States. Since your information can be processed and stored in the United States, United States federal and state governments, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your information through laws applicable in the United States. In addition, your personal information may be disclosed in response to inquiries or requests from government authorities in the countries in which we operate. By using the Service, you understand that your information can be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

See also “Cross-Border Transfers” in Your Rights, below.

HOW WE CAN DISCLOSE YOUR INFORMATION

Information can be disclosed to other users and service providers, third parties and/or other parties in accordance with this Privacy Policy, subject to applicable law. Please note that a user can choose not to disclose certain information. Please see Information We Collect and How We Can Use Your Information above and Cookies and Other Technologies; Do Not Track, Your Choices Regarding Your Information, Your Rights and Retention below.

1. **Profile.** The name and profile of a user of the Service, as well as other information relating to the use of the Service (such as geographic location information which can include any or all of the following - GPS coordinates; listing address and details for residential and other properties; travel plans; and trip information) and online status, may be visible to other users. DO NOT INCLUDE INFORMATION IN YOUR PROFILE AND OTHERWISE PROVIDE INFORMATION WHEN USING THE SERVICE THAT YOU WANT TO KEEP PRIVATE (FOR EXAMPLE, GEOGRAPHIC LOCATION AND TRAVEL PLANS AND INFORMATION). Service users can use the search feature in the Service to search for other users by different profile criteria, like profile name, age, height, weight, geographic location, physical characteristics, ethnicity, personal interests, relationships or preferences or residence information. Your profile information will be used for these searches. Service user interface may include a feature to make certain items of profile information non-public. However, even if you choose to make non-public certain items of your profile information or other information if and as permitted by the user interface, sophisticated users who use the Service in an unauthorized manner may nevertheless be able to obtain this information. Please see Information We Collect above.

2. **User Submissions.** A user of the Service can voluntarily provide information, content and materials (such as pictures, audio clips, reviews, ratings, ideas, notes, concepts, creative suggestions, questions, messages and comments) from themself and other users ("User Submissions") to the Service. Before submitting content, please read our TOS and Profile Guidelines carefully.

We reserve the right to remove any such content for any reason or no reason, including without limitation if in our sole opinion such information or material violates, or may violate, any applicable law or our TOS or Profile Guidelines or to protect or defend our rights or property or those of any other party. We also reserve the right to remove information upon the request of any party, including any other party.

3. **Distance Information.** YOU UNDERSTAND THAT WHEN YOU USE THE SERVICE, AS A DEFAULT, INFORMATION ABOUT YOUR DISTANCE FROM OTHER USERS IS PUBLIC AND OTHER USERS OF SUCH SERVICE CAN SEE THIS INFORMATION WITHIN YOUR PROFILE. Service users can use the search feature in the Service to search for other users by distance. Information about your distance from other users will be used for these searches. This information is public, but the Service may include a feature to hide or change the accuracy of this information. However, even if you choose to hide the display of this information, sophisticated users who use the Service in an unauthorized manner may nevertheless be able to determine your geographic location. Please see Information We Collect above.

4. **Geographic Location Information.** The geographic location of a user of the Service, as well as other information relating to the use of the Service (such as age and ethnicity) can be disclosed to other users and service providers, third parties and/or other parties. The geographic location of a user of the Service can be used to determine which services, disclosures, features, content and information will be available to you and certain services, disclosures, features and content and information made available through the Service may only be available to users in certain geographic locations. Please see Information We Collect above.

5. **Service Providers, Third Parties and/or Other Parties.** We can use service providers, third parties and/or other parties to provide the Service or to perform functions in connection with the Service, including without limitation, monitoring compliance by users with and enforcement of and applying our TOS and Profile Guidelines. We can disclose information about you that they need to perform their functions (for example, customer support, payment card and other payment processing, IT management, cloud storage, transcription, fulfillment and shipping, verification services, and performing any of the other actions or activities allowed under this Privacy Policy). For example, the https://shop.scruff.com/ Website is hosted by Shopify. Also, we disclose your device identifier and demographic information with our analytics partners. We can also run advertising on other websites, applications and services via our advertising display partners. We can disclose your geographic location information and any other information that we collect or that you provide in connection with your use of the Service and any other information derived from or based upon the foregoing information with service providers, third parties and/or other parties. Service providers, third parties and/or other parties can also collect information directly from you and about you from other sources (including without limitation, other applications). Please see Information We Collect above.

Perry Street maintains a list of service providers, third parties and/or other party processors as described in the article "Third-Party Processors" at https://support.scruff.com, https://support.jackd.com, and https://support.growlr.com. Or contact customer service from within any of our other services or products.

6. **Service Provider, Third Party and/or Other Party Promotions.** We can disclose your information with service providers, third parties and/or other parties to conduct promotions.

7. **Business Changes.** If we become involved in, or engage in the preparatory steps leading to, a merger, acquisition, sale of assets, divestiture, joint venture, securities offering, financing, bankruptcy, reorganization, liquidation, dissolution, or other transaction or if the ownership of all or substantially all of our business otherwise changes, we can disclose or transfer your information to another party or other parties in connection therewith and it can be used subsequently by such party or parties.

8. **Legal and Safety.** Other parties such as law enforcement, government entities, courts or service providers, third parties and/or any other parties as required or allowed by applicable law and/or for enforcement of or applying our TOS and Profile Guidelines, such as for the legal and safety purposes described in How We Can Use Your Information above or otherwise to help prevent harm or fraud to us, you or others.

9. **Anonymized Information.** We can disclose anonymized information relating to visitors to and users of the Service with any service provider, third party and/or other party for any purpose, subject to applicable law.

10. **For Analytics.** We or a service provider, third party and/or other party can use analytics to understand how you use the Service, determine how you access the Service and improve the Service.

11. **With Your Consent.** We can disclose your information other than as described in this Privacy Policy if we notify you and you consent to the disclosure thereof, except as otherwise expressly provided in Your Rights-Cross-Border Transfers below, and subject to applicable law.

12. **At Your Request.** We can disclose your information with any other individual or service provider, third party and/or other party at your request, subject to applicable law.

13. **For Any Other Purpose with Notice by Us.** We can disclose your information for any other purpose for which we provide you with notice, subject to applicable law.

14. **Cookies and Other Technologies; Do Not Track.** Please see Cookies and Other Technologies; Do Not Track below.

COOKIES AND OTHER TECHNOLOGIES; DO NOT TRACK

We, along with our service providers, third parties and/or other parties, can use cookies, Web beacons, persistent device identifiers, advertising identifiers and other technologies.

1. **Cookies.** Cookies are small bits of information that are transferred to and stored in separate files within your computer's browser. You can instruct your browser to stop accepting cookies. But if

you do not accept cookies, you may not be able to use all portions or all functionality of the Service. Please see www.allaboutcookies.org for additional information about cookies.

- Persistent cookies remain on the visitor's or user's device after the browser has been closed.
- Session cookies exist only during a visitor's or user's online session and disappear from the visitor's or user's device when they close the browser software.

2. **Web Beacons.** Web beacons are small strings of code that provide a method for delivering a graphic image on a Web page or in an email message for the purpose of transferring data. You can disable the ability of Web beacons to capture information by blocking cookies.

3. **Persistent Device Identifiers.** Persistent device identifiers are unique strings that are associated with the device that you use to connect to the Service. Persistent device identifiers can be modified or disabled by sophisticated users.

4. **Advertising Identifiers.** Advertising identifiers are unique strings associated with your device provided by the operating system. Advertising identifiers can be modified or disabled by users in the operating system settings. Please see Do Not Track below for more information about how to configure these settings.

5. Service Providers. Service providers, third parties and/or other parties may collect personally identifiable information about an individual user's online activities over time and across different Internet services when a user uses the Service.

6. Opt-out Links. Below are links to resources for opting out of online tracking.

Google Analytics collects information from visitors and users and reports trends without identifying individual visitors or users. Google Analytics uses its own cookie to track visitor and user interactions. Website owners can view a variety of reports about how visitors and users interact with their website so they can improve their website and how people find it. Google's privacy policy applies to their collection, use and disclosure of your information. Please review the following links to better understand their practices: https://policies.google.com/privacy, https://policies.google.com/technologies/partner-sites, https://www.google.com/analytics/terms/ and https://tools.google.com/dlpage/gaoptout.

We use Google Analytics to better understand who is using the Service, and how people are using it. Google Analytics uses cookies and persistent device identifiers to collect and store such information as time of visit, pages visited, time spent on each page of the Service, IP address, and type of operating system used. We use this information to improve the Service and make it appealing to users.

7. **Do Not Track.** At this time, we do not respond to "do not track" signals sent from Web browsers or other mechanisms that provide users the ability to exercise choice regarding the collection of personally identifiable information about a user's online activities over time and across service provider, third party and/or other party Internet services.

Devices provide a setting that disables your advertising identifier. If such setting is disabled, we can record when a user installs the Service, and whether or not this action was the result of a tap on an ad outside of such Service. We can also run advertising on other websites, applications and services

via our advertising display partners. For users who have enabled such setting on their device, this data will not be collected. Please note that such setting may not be available on all operating systems or versions of the Service. To enable such setting, visit https://support.scruff.com, https://support.jackd.com, or https://support.growlr.com and see "Limit Ad Tracking." We may update these instructions periodically as new information becomes available from device operating system manufacturers.

SECURITY

We take administrative, technical and physical measures to help protect the information you provide through, or in connection with, the Service from accidental or unlawful destruction, loss or alteration and from unauthorized access, use, or disclosure. Please be aware, however, that no security measures can guarantee absolute security. No Internet, email or application transmission or method of electronic storage is ever fully secure or error free. Email or other communications, including without limitation, those sent through, or in connection with, the Service, may not be secure. You should use caution whenever submitting information through, or in connection with, the Service, and take special care in deciding which information you provide us with.

LINKS TO OTHER WEBSITES AND MOBILE APPLICATIONS

When you click on a link to any other website, application or content, you will leave the Service and go to another website or application and another entity can collect information from or about you. We have no control over, do not review, and cannot be responsible for, these websites or applications or their content. Please be aware that the terms of this Privacy Policy do not apply to these websites or applications or content, or to any collection of data after you click on links to these websites, applications or content. Please also read our TOS carefully.

YOUR CHOICES REGARDING YOUR INFORMATION

You have choices regarding your information on the Service.

1. **Changing Your Information and Privacy Settings.** You can make changes to your information, including accessing your information, correcting or updating your information or deleting your information, by editing your profile in the Service or by requesting deletion of your personal information by submitting a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.

2. **Email Communications.** When you receive promotional email communications from us, you can indicate a preference to stop receiving promotional email communications from us by following the "unsubscribe" instructions in a promotional email communication from us. However, we can send you email communications relating to the Service.

3. **Push Notifications.** You can at any time request opt out from further allowing us to send you push notifications by adjusting the permissions in your device.

4. **Withdrawing Consent.** You can withdraw your consent to our processing of your personal information at any time by contacting us at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.

5. **Cookies and Other Technologies; Do Not Track.** Please see Cookies and Other Technologies; Do Not Track above.

6. **Retention.** Please see Retention below.

7. **Rights.** Please see Your Rights-Europe Rights, Your Rights-Processing and Your Rights-Cross-Border Transfers, Your Rights-Korea Rights, Your Rights-California Rights, Your Rights - Consumer Health Data Rights, Your Rights -Biometric Data Rights and Your Rights - Dating Safety Rights below.

YOUR RIGHTS

1. **Europe Rights.** The following rights apply in certain circumstances only to individuals in the European Economic Area, United Kingdom and Switzerland (collectively referred to herein as "Europe").

- To request confirmation of whether or not we process your personal information, details of the information that we hold about you and how we use it and to access your personal information and to be provided with a copy, please submit a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.
- To request rectification of your personal information: if you believe that the personal information we hold about you is inaccurate, you can request that we correct it and can also request us to complete personal information about you which is incomplete by submitting a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.
- To request deletion of your personal information on one of the following grounds, please visit https://support.scruff.com/portal/kb/articles/permanently-delete-my-profile for users of the SCRUFF App, https://support.jackd.com/portal/kb/articles/permanently-delete-my-profile-23-12-2023 for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.
    - you believe that it is no longer necessary for us to hold your personal information;
    - we are processing your personal information on the basis of legitimate interests and you object to such processing and we cannot demonstrate an overriding legitimate ground for the processing;
    - where our processing of your personal information is for direct marketing purposes and you object to such processing;

    - you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; or
    - you believe the personal information we hold about you is being unlawfully processed by us.
- To request that we restrict processing of your personal information on one of the following grounds, please submit a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.
    - where you believe the personal information we hold about you is inaccurate and while we verify accuracy;
    - we want to delete your personal information as the processing is unlawful but you want us to continue to store it;
    - we no longer need your personal information for the purposes of our processing but you require us to retain the information for the establishment, exercise or defense of legal claims; or
    - where you have objected to us processing your personal information based on our legitimate interests and we are considering your objection.
- To request to object to our processing of your personal information where it is based on our legitimate interests or where such processing is for direct marketing purposes, please submit a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.
- Data portability: to request to directly receive the personal information that you have provided to us in a structured, commonly used and machine-readable format where the processing is based either on consent or on the performance of a contract, and the processing is carried out by automated means, please visit https://support.scruff.com/portal/kb/articles/profile-download-requests for users of the SCRUFF App or https://support.growlr.com for users of the Growlr App.
- To lodge a complaint with a supervisory authority in an applicable European country if your request or inquiry is not satisfactorily resolved by us after submitting a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.

2. **Processing.** We process the information of individuals in Europe based on one or more of the following legal bases:

- Performance of a contract: we or a third party process your information to perform the contract that you have with us (for example, providing the Service to you).
- Legitimate interests: we or a third party can use your information where we or such third party have legitimate interests to do so (for example, analyzing users' behavior on the Service to improve our offerings and processing information for administrative, fraud detection and other legal purposes).
- We can ask for your consent to use your information for specific purposes. You can withdraw your consent to our processing of your personal information at any time by submitting a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for

users of the Growlr App, or contact customer service from within any of our other services or products.

- Legal obligation: we may be required to use your information to comply with a legal obligation (for example, complying with law, in response to legal process or cooperating with government or law enforcement agencies or officials or service providers, third parties and/or any other parties).
- The processing is necessary to protect the vital interests of our users or of others (for example, processing personal information, including disclosing data with law enforcement agencies in case of threats to the safety of users or of others).

3. **Cross-Border Transfers.** For transfer of your personal information from a European country to a country that is not considered adequate, adequate measures have been put in place.

We participate in the EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), the United Kingdom ("UK") Extension to the EU-U.S. DPF and the Swiss-U.S. Data Privacy Framework ("Swiss-U.S. DPF") as set forth by the U.S. Department of Commerce. We have certified to the U.S. Department of Commerce that we adhere to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the UK (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. We have certified to the U.S. Department of Commerce that we adhere to the Swiss-U.S. Data Privacy Framework Principles ("Swiss-U.S. DPF Principles") with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the applicable Data Privacy Framework ("DPF") Principles shall govern. To learn more about the DPF program, and to view our certification, please visit https://www.dataprivacyframework.gov/. EU, UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first submit a support request at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products, or, alternatively, contact us at support@perrystreet.com. We have further committed to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to any complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF that we do not otherwise satisfactorily address with you directly. Under certain conditions, as more fully described at https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2, you can pursue binding arbitration when other dispute resolution procedures have been exhausted.

Please see this Privacy Policy regarding:

- the types of personal data we collect,
- the purposes for collection and use of such personal data,
- the types of third parties to which we can provide personal data and the purposes for which we can do so; and
- the right of individuals to access their personal data and the choices and means we offer individuals for limiting the use and disclosure of their personal data.

If personal data covered by this Privacy Policy is to be used for a new purpose that is materially different from that for which the personal data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified in this Privacy Policy, we will provide you with an opportunity to choose whether to have your personal data so used or disclosed. In such instances, users may request to opt out of such uses or disclosures of personal data by using the mechanisms provided in the Service or contact us at support@perrystreet.com.

Certain personal data, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, is considered sensitive personal data. We will not use sensitive personal data for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual unless we have received your affirmative and explicit consent (opt-in).

When we receive personal data and then transfer it to a third party acting as an agent on our behalf, we remain liable under the applicable DPF Principles if the agent processes the personal data in a manner inconsistent with the applicable DPF Principles, unless we prove we are not responsible for the event giving rise to the damage.

We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission ("FTC"). The FTC has jurisdiction over our compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. We may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

4. **Korea Rights.**

- For Korea Notice of Overseas Transfer, please see Where We Process and Store Your Information above.
- To request expedited removal of the information we retain, please contact customer service from within any of our services or products. You may request expedited removal if:
    - you believe that it is no longer necessary for us to hold your personal information;
    - we are processing your personal information on the basis of legitimate interests and you object to such processing and we cannot demonstrate an overriding legitimate ground for the processing;
    - where our processing of your personal information is for direct marketing purposes and you object to such processing;
    - you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; or
    - you believe the personal information we hold about you is being unlawfully processed by us.

5. California Rights. Please see our Privacy Notice for California Residents at https://www.perrystreet.com/privacyca.

6. Consumer Health Data Rights. Please see our Consumer Health Data Privacy Notice at https://www.perrystreet.com/legal/health-privacy.

7. Biometric Data Rights. Please see our Notice and Consent to Process Biometric Data at https://www.perrystreet.com/legal/biometric.

8. Dating Safety Rights. Please see our Safety Policy Information at https://www.perrystreet.com/legal/safety.

Please see Information We Collect, How We Can Use Your Information, Where We Process and Store Your Information, How We Can Disclose Your Information, Cookies and Other Technologies; Do Not Track and Your Choices Regarding Your Information above and Retention below.

RETENTION

We will retain your personal information for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a legitimate business need to do so in connection with your registered account, or as required by law (for example, for legal, tax, accounting or other purposes), whichever is the longer.

If you have elected to receive email communications from us, we retain information about your email preferences until you opt out of receiving these email communications and in accordance with our policies.

To determine the appropriate retention period for the categories of your personal information, we will consider the amount, nature, and type of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. In certain circumstances, we can anonymize your personal information, subject to applicable law.

Please also see Information We Collect, How We Can Use Your Information, Where We Process and Store Your Information, How We Can Disclose Your Information, Cookies and Other Technologies; Do Not Track, Your Choices Regarding Your Information and Your Rights above.

CHILDREN

We do not knowingly collect personal information from individuals under age eighteen (18). If you are under the age of eighteen (18), please do not access, use or submit any personal information through the Service. If you have reason to believe that we may have accidentally received personal information from an individual under age eighteen (18), please submit a support request immediately at https://support.scruff.com for users of the SCRUFF App, at https://support.jackd.com for users of the Jack'd App, at https://support.growlr.com for users of the Growlr App, or contact customer service from within any of our other services or products.

CHANGES TO PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time and from time to time and we can require your consent thereto. Please review this Privacy Policy periodically, and especially before you provide any information. This Privacy Policy was made effective on the date indicated above.