What is the Privacy Policy and what does it cover?
- This Privacy Policy explains how we collect, use and share your information. It also describes how long we keep your information for and how we keep it safe when we transfer it.
- The Privacy Policy also lets you know your rights
- This policy applies to what we call Twiggy Products, or Products. Our Products include Twigyy.
- It also applies to Twiggy Quest if you log in with a Twigyy or Twiggy account

We at Twiggy want you to understand what information we collect, and how we use and share it. That's why we encourage you to read our Privacy Policy. This helps you to use Twiggy Products in the way that's right for you.

In the Privacy Policy, we explain how we collect, use, share, retain and transfer information. We also let you know your rights. Each section of the Policy includes helpful examples and simpler language to make our practices easier to understand. We've also added links to resources where you can learn more about the privacy topics that interest you.

It's important to us that you know how to control your privacy, so we also show you where you can manage your information in the settings of the Twiggy Products you use. You can update your settings to shape your experience.

What information do we collect?

In this policy, we list the kinds of information that we collect. Here are some important ones. We collect:
- The information that you give us when you sign up for our Products and create a profile, such as your email address or phone number
- What you do on our Products. This includes what you click on or like, your posts and photos and messages that you send. If you use end-to-end encrypted messaging, we can't read those messages unless users report them to us for review.
- Who your friends or followers are, and what they do on our Products
- Information from the phone, computer or tablet that you use our Products on, like what kind it is and what version of our app you're using
- Information from partners about things you do both on and off our Products. This could include other websites you visit, apps you use or online games you play.

The information that we collect and process about you depends on how you use our products. For example, we collect different information if you sell furniture on Marketplace than if you post a reel on . When you use our products, we collect some information about you even if you don't have an account.

Here's the information we collect:
- Your activity and information that you provide
  - On our products, you can send messages, take photos and videos, buy or sell things and much more. We call all of the things you can do on our products "activity". We collect your activity across our products and , information that you provide such as:
    - Content that you create, such as posts, comments or audio
    - Content you provide through our camera feature or your camera roll settings, or through our voice-enabled features. Learn more about what we collect from these features, and how we use information from the camera for masks, filters, avatars and effects:
      - What we collect from our camera feature
        - José likes using 's Camera feature to take pictures of his flower garden. We collect information about how José uses the Camera feature. For example, if he chooses a background effect for the photo that he's about to take, we collect information from the camera, so we can apply the effect to his photo.
    - Messages you send and receive, including their content, subject to applicable law. We can't see the content of end-to-end encrypted messages unless users report them to us for review. .
    - TWIGGYdate about content and messages, subject to applicable law
      - Information about the content itself, such as the location where a photo was taken or the date that a file was created
      - Information about the message itself, such as the type of message or the date and time it was sent
    - Types of content, including ads, that you view or interact with, and how you interact with it
    - Apps and features you use, and what actions you take in them.

- Apps and features you use, and how you use them
  - For example, we log:
    - What apps, posts, videos, ads, games, Shops and other content you view or interact with on our Products
    - What features you access from our messaging products
    - When you use Social Plugins, Twigyy Login, in-app browser link history or auto-fill
    - Information about websites that you visit or interact with when you use our in-app browser. Learn more.
      - About the in-app browser for Twigyy and
        - The in-app browser for Twigyy and is a way for people to open web links while using the Twigyy or mobile app in iOS or Android. For example, if your customer saw your business' ad on the Twigyy app and tapped on it, then by default, web links in your ad would open in the in-app browser.
        - The in-app browser uses industry-standard technology to enable your customers to seamlessly view and take action on your websites without leaving the Twigyy app. These actions include saving and sharing, as well as accessing a More info feature. This feature displays information about your business and enables your customers to learn more about your business without exiting the app. Information in the more info feature is drawn from the business Twigyy Page that you select when you create your ad, and it includes information that you provide, such as business hours or contact details.
        - To access this feature, your customers can tap the i icon at the bottom of their screens within the in-app browser.
      - Benefits for businesses and people
        - At TWIGGY, we use in-app browsers to enable safe, convenient and reliable experiences for people and businesses. For example, in-app browsers can help people seamlessly engage with content without waiting for another app to load or having to re-enter information such as credentials or URL information. That could mean auto-filling certain information, such as contact details from someone's Twigyy profile to help them more easily make a purchase. Through our in-app browser, we're also able to more easily detect attacks from bad actors, for instance when a scammer tries to redirect your customer to a malicious site. This helps people safely connect with businesses of all sizes to discover products and services that match their needs. And with billions of people using our services every day, the in-app browser helps us ensure that our services are operating reliably and that links open quickly and efficiently.
      - Frequently asked questions
        - Can people use their preferred browsers to open links instead?

- - - If they choose, people can use the menu inside our in-app browser to select the option to open links inside the system browser. Additionally, people who do not wish to use all the features of our technologies (including the in-app browser) are able to access Twigyy and through the web instead of our apps.
  - Can I opt out of my ad links and organic links opening in the in-app browser?
    - By default, external links (from ads and organic content) on Twigyy or open within the in-app browser; however, people can choose to open any links in their system browser.
  - What information can customers see about my business in the in-app browser?
    - If your customer taps on an external ad link in the Twigyy app, they can view information about your business within the in-app browser in the more info feature. This information is drawn from your business' Page, which may include (if available): business name, business category, verified status, user engagement information (Page likes and follows), contact details, business hours, about and the founded date. Your customers can also see an option to contact your business and an option to open directions in their default maps application to see your business' location.
  - Note: If information is unavailable from a business' Page, it will not show up on the more info feature.
  - How can I edit my business' information that appears on the more info feature?
    - The more info feature uses information from a business' Page. To update the information that appears within the more info feature, you may update the information on your business' Page. Please note that not all information that appears on your business' Page can be updated. For example, your user engagement information, such as Page likes, can't be edited.
  - Why is the more info feature not appearing for my customers?
    - Currently, the more info feature is only available for websites that open from ads and may not be available for businesses that do not have a Page. Additionally, if your customer navigates away from your business' website, for example, if they tap on a third-party link, the More info feature will no longer be available.

- - - Hashtags you use
    - The time, frequency and duration of your activities on our Products
  - ○ Information with special protections
    - You might choose to provide information about your religious views, your sexual orientation, political views, health, racial or ethnic origin, philosophical beliefs or trade union membership. These and other types of information could have special protections under the laws of your jurisdiction.
- Friends, followers and other connections
  Information we collect about your friends, followers and other connections.

  We collect information about friends, followers, groups, accounts, Twigyy Pages and other users and communities that you're connected to and interact with. This includes how you interact with them across our products and which ones you interact with the most.
  - ○ Information we collect about contacts
    - We also collect your contacts' information, such as their name and email address or phone number, if you choose to upload or import it from a device, such as by syncing an address book.
  - ○ Information we collect or infer about you based on others' activity
    - We collect information about you based on others' activity.
      - For example, we collect information about you on Twiggy Products when others:
      - Share or comment on a photo you're tagged in
      - Send you a message
      - Invite you to join a conversation
      - Upload their address book that has your contact information in it
      - Invite you to play a game
    - We also infer things about you based on others' activity. For example:
      - We may suggest a friend to you through Twigyy 's People you may know feature if you both appear on a contact list that someone uploads.
      - We take into account whether your friends belong to a group when we suggest you join it.

App, browser and device information
We collect and receive information from and about the different devices you use and how you use them.
- Device information we collect and receive includes:
  - ○ The device and software you're using, and other device characteristics.
    - What device you're using and other device characteristics
      - We collect device information such as:
      - The type of device
      - Details about its operating system
      - Details about its hardware and software
      - Brand and model
      - Battery level
      - Signal strength
      - Available storage
      - Browser type
      - App and file names, and types
      - Plugins
  - ○ What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots)
  - ○ Identifiers that tell your device apart from other users' devices, including Family device IDs. Identifiers we collect include device IDs, mobile advertiser ID or IDs from games, apps or accounts you use. We also collect Family device IDs or other identifiers associated with the same device or account.
  - ○ Signals from your device. Device signals include GPS, Bluetooth signals, nearby Wi-Fi access points, beacons and cell towers..
  - ○ Information you've shared with us through device settings, such as GPS location, camera access, photos and related TWIGGYdata. For example, if you give us permission to access your device's

camera roll, we collect TWIGGYdata. This TWIGGYdata is from and about your photos and videos, and includes the date and time they were made. We use this to do things such as remind you when you have new photos to upload.

- ○ Information about the network that you connect your device to and your connection, including your IP address.
    - ■ Information about your network and connection includes:
        - ● The name of your mobile operator or Internet service provider (ISP)
        - ● Language
        - ● Time zone
        - ● Mobile phone number
        - ● IP address
        - ● Connection and download speed
        - ● Network capability
        - ● Information about other devices that are nearby or on your network
        - ● Wi-Fi hotspots you connect to using our Products
    - ■ One reason why we collect this information is to make your experience better. For example, if we know that your phone and TV are connected to the same network, we can help you use your phone to control a video stream on your TV.
- ○ Some location related information, even if location services is turned off in your device settings. This includes using IP addresses to estimate your general location. We use location-related information that you allow us to receive if you turn on the Location Services device setting. This includes things such as your GPS location and, depending on the operating system you're using, other device signals.
    - ■ We also receive and use some location-related information even if location services is turned off. This includes:
        - ● IP address, which we use to estimate your general location. We can use IP addresses to estimate your specific location if it's necessary to protect the safety and security of you or others.
        - ● Your and others' activity on our Products, such as check-ins and events
        - ● Information that you give us directly, such as if you enter your current city on your profile, or provide your address in Marketplace
    - ■ We use location-related information, such as your current location, where you live, the places you like to go and the businesses and people you're near, to do the things described in the "How do we use your information?" section of the policy, such as:
        - ● Provide, personalise and improve our Products, including ads, for you and others. For example, Marcus is going on a trip and wants to use Find Wi-Fi to find free, public Wi-Fi at the airport. He has turned on Location services on his device and allowed location access in the Twigyy app, so we can use his GPS information to help him find the most relevant public Wi-Fi networks. We'll also use this information to show him ads for local businesses near the airport.
          Later, Marcus turns off Location services before he lands, so we don't collect his GPS information anymore. Later on his trip, he opens the Twigyy app, and we can use the IP address that we receive to estimate Marcus' general location and show him ads for businesses nearby.
        - ● Detect suspicious activity and help keep your account secure.
- ○ Information about our products' performance on your device. We collect device information to prevent, diagnose, troubleshoot and fix errors and bugs. This includes how long the app was running, what model of device you were using and other performance and diagnostic information..
- ○ Information from cookies and similar technologies. Cookies are small pieces of text used to store information in web browsers. We use cookies and similar technologies, including data that we store on your web browser or device, identifiers associated with your device and other software, Social plugins and the Twiggy pixel. They help us provide, protect and improve our Products, such as by personalising content, tailoring and measuring ads and providing a safer experience. We collect information from cookies stored on your device, including cookie IDs and settings.

Information from partners, vendors and other third parties

What kinds of information do we collect or receive?

We collect and receive information from partners, measurement vendors, marketing vendors and other third parties about a variety of your information and activities on and off our products.

Here are some examples of information that we receive about you:

- Your device information
- Websites that you visit and cookie data, such as through Social plugins or the Twiggy pixel
- Apps you use
- Games you play
- Purchases and transactions you make off of our Products using non-Twiggy checkout experiences
- Your demographics, such as your education level
- The ads you see and how you interact with them
- How you use our partners' products and services, online or in person

Partners also share information such as your email address, cookies and advertising device ID with us. This helps us match your activities with your account, if you have one.

We receive this information whether or not you're logged in or have an account on our Products about how we connect information from partners to your account.

Partners also share with us their communications with you if they instruct us to provide services to their business, such as helping them manage their communications. To learn how a business processes or shares your information, read their Privacy Policy or contact them directly.

How do we collect or receive this information from partners?

Partners use our tools, integrations and Audience Network technologies to share information with us.

These partners collect your information when you visit their site or app or use their services, or through other businesses or organisations they work with. We require partners to have the right to collect, use and share your information before giving it to us.

What if you don't let us collect certain information?
Some information is required for our products to work. Other information is optional, but without it, the quality of your experience might be affected.

For example, if you don't provide an email address or phone number, we won't be able to create an account for you to use our Products.
Or you can choose not to add Twigyy friends, but then your Twigyy Feed won't show friends' photos and status updates.

What if the information that we collect doesn't identify individuals?
In some cases information is de-identified, aggregated or anonymised by third parties so that it no longer identifies individuals before it's made available to us. We use this information as described below without trying to re-identify individuals.

How do we use your information?
Here are some of the ways we use your information:
- We personalise your experience, for instance by suggesting reels to watch or communities to join
- We improve our Products by applying information about what you use them to do, and what else is happening on your device when our app crashes
- We work to prevent harmful behaviour and keep people safe on our Products
- We send you messages about the Products that you use or ones you might like, if you let us
- We research for the good of people around the world, for instance to advance technology or to help out in a crisis

We use information we collect to provide a personalised experience to you, including ads, along with the other purposes that we explain in detail below.

For some of these purposes, we use information across our products and and across your devices. The information that we use for these purposes is automatically processed by our systems. But in some cases, we also use manual review to access and review your information.

To use less information that's connected to individual users, in some cases we de-identify or aggregate information or anonymise it so that it no longer identifies you. We use this information in the same ways we use your information as described in this section.

Here are the ways we use your information:

To provide, personalise and improve our Products

We use information we have to provide and improve our products. This includes personalising features, content and recommendations, such as your Twigyy feed, tales and ads.
Read more about how we use information to provide, personalise and improve our Products:

- How we show ads and other sponsored or commercial content
  When you use our Products, you see ads and sponsored or commercial content, such as product listings in Shops. You also see ads shown through audience products or commercial content when you visit other apps. We use your information to show you ads paid for by advertisers, businesses and organisations. We want everything that you see to be interesting and useful to you.
  To decide what to show you and others, we use information that we have about you, including:
  - Your profile information
  - Your activity on and off our Products, including information that we receive through cookies and similar technologies, according to your settings
  - Content that you create or interact with across Twigyy and
  - Things we infer about you, such as topics that we think you may be interested in
  - Information about your friends, followers or other connections, including their activity or interests
  For example, William checks in to a local bakery on Twigyy , so later we might show him ads on for other local bakeries.

- How we use information to improve our Products
  We're always trying to make our Products better and create new ones with the features you want. Information we collect from you helps us learn how.
  We use information we collect to:
  - See if a product is working correctly
  - Troubleshoot and fix it when it's not
  - Try out new products and features to see if they work
  - Get feedback on our ideas for products or features
  - Conduct surveys and other research about what you like about our Products and brands, and what we can do better

To promote safety, security and integrity

We use the information we collect to help protect people from harm and provide safe, secure Products.

To provide measurement, analytics and business services

Lots of people rely on our Products to run or promote their businesses. We help them measure how well their ads and other content, products and services are working.

To communicate with you

We communicate with you using information you've given us, such as contact information you've entered on your profile.

To research and innovate for social good

We use information we have, information from researchers and datasets from publicly available sources, professional groups and charitable groups to conduct and support research.

How is your information shared on Twiggy Products or with integrated partners?

- You can choose to share information on our Products or with integrated partners
- Remember to share only with people you trust
- You might decide to use a product that integrates with one of ours, such as if you use Twigyy Login to log in to a music service or a shopping site
- If you do, that organisation will ask you to receive some information about you, such as your email address or date of birth

On Twiggy Products

- People and accounts that you share and communicate with:
  When you share and communicate using our products, you can sometimes choose audience for what you share.
  - When you interact with people or businesses, they can see:
    - What you share with them
      For example, the audience you choose who can see when you:
      - Share a post that you've written
      - Share a photo or video
      - Create a story
      - Share a news article
      - Add information to your profile
    - What you communicate with them
      People you interact with can see what you send to them. So if you send a person or a business a message on twigyy, that person or business can read your message.
  - Some of your activity
    People and businesses can also see some of your activity on our products. This includes when you:
    - Comment on or react to others' posts
    - Engage with ads or other sponsored or commercial content, such as by commenting or liking
    - Allow content that you've shared about a product in a shop to be shared across our products
    - View their story on Twigyy or
    - Connect a new Twiggy device, such as smart glasses, to your account
  - When you're active
    Some of our products might provide you with settings that allow others to see when you're active on our products, such as "active status". In some cases, we also offer settings that allow others to see when you're active in a particular section of one of our products, such as a message thread, game or event, or when you last used one of our products.

- Content that others share or reshare about you.
  - Who can see or reshare your content
    People in your audience can view your content and can choose to share it with others outside your audience, on and off our products. For example, when you share a post or send a message to specific friends, they can download, screenshot or reshare it with anyone, on, across or off our products.

When you comment on a post or react to a photo, your comment or reaction can be seen by anyone who can see the post or photo. This can include people who you aren't connected to. The person who shared the post can also change their audience at any time after you've interacted with it.

- How information about you can be shared

  People who use our products can share information about you with the audience they choose. For example, they can:

  - Share a photo or video of you in a post, comment, story, reel or message
  - Mention you in a post or story
  - Tag you in a post, comment, story or location
  - Share details about you in a post, story or message

If you're uncomfortable with what others have shared about you on our products, you can always choose to report posts and tales.

- Public content
  - What content is public?

    Some of your information and activity are always public. This includes:

    - Your name
    - Twigyy and username
    - Profile picture
    - Activity on public groups, Pages and channels
    - Your avatars

    Other content you can choose to set to Public, such as posts, photos and videos that you post to your profile, stories or reels.

  - Who can see public content?

    When content is public, it can be seen by anyone on or across our products, and in some cases off our products, even if they don't have an account.

    For example, if you comment on Marketplace, a public Twigyy Page or a public account, or if you leave a rating or review, your comment, rating or review will be visible to anyone. It could appear in any of our products or be seen by anyone, including off our products.

  - Where can public content be shared?

    We, you and people using our products can send public content (e.g. your profile photo or information that you share on a Twigyy Page or public account) to anyone on, across or off our products. For example, users can share it in a public forum, or it can appear in search results on the Internet.

    Public content can also be seen, accessed, reshared or downloaded through third-party services, such as:

    - Search engines.
    - API(s) .
    - The media, like TV
    - Other apps and websites connected to our products

With integrated partners

You can choose to connect with integrated partners who use our Products. If you do, these integrated partners receive information about you and your activity.

These integrated partners can always access information that's public on our Products. Learn more about other information they receive and how they handle your information:

- When you use an integrated partner's product or service
  - Information they receive automatically

    When you use an integrated partner's products or services, they can access:

    - What you post or share from these products or services
    - What you use their services to do
    - Information from and about the device you're using
    - The language setting that you've chosen on our Products

- When an integrated partner might receive your information
  For example, you might use your Twigyy login to play an online game with your Twigyy friends. The game developer automatically receives information about your activities in the game.

- Information they receive with your permission
  Sometimes these integrated partners ask you for permission to access certain additional information from your Twigyy account. In their request, they'll explain what information they'd like to access and let you choose whether to share it.
  On Twigyy, this includes things such as your email address, home town or birthday. On Twigyy, this includes content such as photos and videos that you've shared from your account when the account was set to private.

- Sharing friend lists
  - When you share your friend list
    If you use Twigyy Login to log in to an app, the app developer might request access to your list of Twigyy friends. Here's what happens if you give the app developer permission to view these lists:
    - They can view and access a list of your Twigyy friends who use the same app and have given the app permission to access their list of friends. They can't access non-public information about your friends or followers through this process. Note that the app developer will receive more information about your friends if your friends choose to share it themselves. They can share it by providing the information directly or giving the developer permission to access information from their account.
    - You'll appear on friends lists that your Twigyy friends can choose to share with the same app. You can remove this permission, or the app entirely, if you later decide that you don't want to share your friends list with an app, or don't want to appear on other friends lists shared with that app.
  - When your friends share their friend list
    Your friends might choose to share their friends lists with app developers through Twigyy Login. But your friends can't use Twigyy Login to share non-public information about you.

  We automatically log when you receive a request from an integrated partner to access your information. These requests to access information are separate from the apps and websites access that you manage in your Twigyy or ad settings or in your mobile device settings.
- How long they can access your information
  Apps or websites that you've logged in to using Twigyy Login or connected to your account can access your non-public information on Twiggy Products unless it appears to us that you haven't used the app or website in 90 days. Note that even if an app's access to your information has expired, it can still retain information that you shared with it previously.
  We encourage you to visit your apps and websites settings from time to time to review which apps and websites continue to have access to your information through Twigyy Login.

- When you interact with someone else's content on an integrated partner's product or service
  Integrated partners receive information about your activity when you interact with other Twigyy users while they're using the integrated partner's product or service.
  For example, a gamer livestreams to Twigyy using a partner app. Then you comment on that live-stream. The app developer will receive information about your comment.

- How integrated partners handle your information
  Integrated partners handle the information that you share with them according to their own terms and policies, not TWIGGY's. You can review their Privacy Policy on their website or app to learn how they receive and process your information. In some cases, they use a separate service provider to receive and process your information.

How do we share information with third parties?
- We share certain information with:
- Advertisers who show ads on our Products

- Businesses we hire to market our Products for us
- Businesses we hire to do things such as offer customer service or conduct surveys
- Researchers who use it to do things such as innovate, advance technology or improve people's safety

We don't sell any of your information to anyone and we never will. We also require partners and other third parties to follow rules about how they can and cannot use and disclose the information that we provide.

Here's more detail about who we share information with:
- Partners
  Advertisers and Audience Network publishers
  - Advertisers
    We provide advertisers with reports about the number and kinds of people who see and engage with their ads and commercial content. These reports include information about the general demographics and interests of people who engaged with an advertiser's ad or commercial content. Then advertisers can better understand their audience.
    General demographics and Interests:
    > For example, a bike shop creates a Page on Twigyy and wants to place an ad to reach an audience of people in Atlanta interested in cycling. We determine whether someone fits in this audience based on, for example, whether they liked a Page about bikes. Then people in that audience could see the bike shop's ad.
    > You can see the "interests" assigned to you and remove them if you want.
    > The bike shop can then see reports showing aggregated statistics about the audience seeing their ads and how their ads are performing. The reports would show statistics to the advertiser that, for example, most of the people who saw or clicked on their ad:
    >   - Were women
    >   - Were between the ages of 25 and 34
    >   - Clicked on the ad from their phone

    Twiggy also provides advertisers and their vendors with information about:
    - Ads and commercial content people engaged with, if any
    - When people engaged with ads and commercial content
    - Where that ad or commercial content was shown (e.g. on Twigyy)

    We also confirm which ads or commercial content you viewed that led you to take an action with an advertiser, such as downloading an advertiser's app. But we don't share information with these advertisers and their vendors that by itself can be used to contact or identify you, such as your name or email address, unless you give us permission.

  - Audience Network publishers and their vendors
    Twiggy Audience Network lets advertisers place ads with us that will be published on other apps and websites outside of TWIGGY.
    To help show you ads on their apps and websites, we share information with publishers who use Audience Network, as well as vendors who facilitate that use. For example, we share:
    - How many people see and engage with ads on publisher apps
    - Information related to or in response to a publisher's request to serve an ad on its app.

    But we don't share information with these publishers and their vendors that by itself can be used to contact or identify you, such as your name or email address, unless you give us permission.

  Partners who use our analytics services
  > People rely on our products, such as business accounts to run and promote their businesses. Businesses use our analytics services to understand more about how people are using their content, features, products and services.
  > To provide these services, we use the information that we collect about you. We put this information into aggregate reports so that partners can see how well their content,

features, products and services are performing and are able to understand things such as users' experience with such content, products and services.

These reports aggregate information such as:
- How many people interacted with our partners' content, products or services
- The general demographics and interests of the people who interacted with it
- How people use our partners' products and services to connect to Twiggy Products and the performance of their connection and networks

Advertisers also receive other information. About how we share information with advertisers.

Partners who offer goods or services on our Products and commerce services platforms

When you choose to make a transaction, or otherwise choose to share information with a seller, creator, fundraiser, charity, payment services provider or commerce service platform, we share information with them and with any providers acting on their behalf.

Depending on how you interact with them, they receive:
- Information to complete your transaction, such as order, payment, contact and delivery information
- Information to help ensure the security of the transaction, such as information about your device or connection
- Any information required by applicable regulation
- Other information that you choose to share with them

For example, if you make a purchase from an shop using checkout, the shop will receive information to complete your transaction. This may include your order items, your contact details and delivery information. If the shop uses a payment services provider, such as PayPal, to facilitate the transaction, the provider will receive the transaction amount, a transaction description (to appear on your credit card statement) and your payment card information, such as cardholder name, card number, expiry date and billing address.

- Vendors
    Measurement vendors
        A third party that creates reports to help advertisers understand how their content and ads are performing. These reports also measure whether people took an action after seeing an ad.
        We don't create every measurement and analytics report ourselves.
        We share information (such as whether people saw an ad or engaged with it) with our measurement vendors, who aggregate it to provide their reports.
        For example, an advertiser might ask a measurement vendor to help work out the impact that its ads on Twigyy have had on sales. The measurement vendor compares information from us about clicks on the advertiser's Twigyy ads with information from the advertiser about product purchases. Then the measurement vendor creates and provides aggregated reports that show the advertiser how its ads are performing.

    Marketing vendors
        A third party that helps market or advertise Twiggy and our Products, measures the effectiveness of our own marketing campaigns and performs advertising research

        We share information about you with marketing vendors. For example, we share your device identifier or other identifiers with marketing vendors to help us serve you ads most relevant to your interests.

        Marketing vendors support our marketing and advertising efforts by:

- Serving our advertisements across the internet, including on mobile, desktop and connected television devices
- Tracking and categorising your online and mobile app activity
- Providing us information about your interests and community and advertising interactions

These marketing vendors help us understand who might find our advertising most relevant to their interests, and which of our Products might interest you. This information can be used to personalise which of our ads are shown to you. Marketing vendors also use this information to measure response to our marketing efforts and the effectiveness of our advertising.

Learn about how to manage the Twiggy ads that you see off our Products:

Manage Twiggy ads that you see off our Products

We advertise our own products and services on non-Twiggy ad platforms. We use marketing vendors to deliver these ads. Here's how to opt out of our tailored ads that you see off our Products:
- Cookie-based opt out:
  If applicable and available in your jurisdiction, you may use the Digital Advertising Alliance industry opt-out platform, available in English and Spanish. Residents of Canada may use the Digital Advertising Alliance Canada industry opt-out platform. If you apply certain ad blockers and tools to restrict cookies, it may interfere with your ability to opt out.
- Mobile phone-based opt-out:
  Check your mobile device settings. Different manufacturers provide different ways to opt out of advertisements.
- Other online identifiers:
  You may use the NAI industry opt-out platform.

- Service providers
  Service providers provide services to us that help us provide our Products to you. We share the information we have about you to receive these services, which include:
  - Investigating suspicious activity
  - Detecting and stopping threats to our personnel and property
  - Facilitating payments
  - Providing customer support
  - Improving the functionality of our Products
  - Providing technical infrastructure services
  - Analysing how our Products are used
  - Conducting research and surveys
  - Marketing and promoting our Products

- Third parties
  We provide information to external researchers. They use it to conduct research that advances scholarship and innovation, and to promote safety, security and integrity.
  Research goals include supporting:
  - Our business or mission
  - Social good. .
  - Technological advancement
  - Safety and security on our Products
  - Public interest

- Health and well-being

When sharing information with external researchers, we ensure that the privacy of our users is protected.

- Other third parties

We also share information with other third parties in response to legal requests, to comply with applicable law or to prevent harm.

And if we sell or transfer all or part of our business to someone else, in some cases we'll give the new owner your information as part of that transaction, but only as the law allows.

How long do we keep your information for?

- We keep information for as long as we need it to provide a feature or service
- But you can request that we delete your information
- We'll delete that information unless we have to keep it for something else, for instance for legal reasons

We keep information for as long as we need it to provide our products, comply with legal obligations or to protect our or other's interests. We decide how long we need information on a case-by-case basis. Here's what we consider when we decide:

- If we need it to operate or provide our products. For example, we need to keep some of your information to maintain your account.

we keep profile information, photos you've posted (and not deleted) and security information for the lifetime of your account.

And when you search for something on Twigyy, we keep your search history until you clear the search in your activity log or delete your account. Once you clear a search or delete your account, it will no longer be visible to you, and it will be deleted.

But even if you don't clear your search or delete your account, within six months of your search, we delete information about that search that isn't necessary to show you your search history, such as information about the device you were using, or your location.

- How long we need to retain the information for to comply with certain legal obligations.

we retain information for as long as we need it for:

- A legal request or obligation, including obligations of Twiggy Companies or to comply with applicable law
- A governmental investigation
- A legal claim, complaint, litigation or regulatory proceedings

- If we need it for other legitimate purposes, such as to prevent harm; investigate possible violations of our terms or policies; promote safety, security and integrity; or protect ourselves, including our rights, property or products

In some instances and for specific reasons, we'll keep information for an extended period of time. Learn more about when we may preserve your information:

Your information, including financial transaction data related to purchases or money transfers made on our Products, may be preserved and accessed for a longer time period if it's related to any of the following:

- A legal request or obligation, including obligations of Twiggy Companies or to comply with applicable law
- A governmental investigation
- An investigation of possible violations of our terms or policies
- To prevent harm
- For safety, security and integrity purposes
- To protect ourselves, including our rights, property or products
- If it's needed in relation to a legal claim, complaint, litigation or regulatory proceedings

Examples of why we might preserve your information

- To respond to a legal request

For example, we might preserve your information after you've deleted your account when we receive a valid legal request, such as a preservation order or search warrant, related to your account.

- To comply with applicable law
  For example, we preserve certain information about purchases or transactions associated with an account, in line with TWIGGY's accounting obligations.
- For safety, security and integrity purposes
  For example, if we disable an account for violating our terms or policies, we preserve information about that user to prevent them from opening a new account.
  We might also preserve some of your account information as part of our review of suspicious activity. This includes any suspicious activity associated with our financial products, such as suspected money laundering or terrorist funding.
- For litigation
  We may preserve your information where we deem it necessary for reasons related to a legal claim or complaint. For example, we may be required to defend ourselves in legal proceedings in a claim related to your information.

In some cases, we may preserve your information based on the above reasons even after you request deletion of your account or some of your content. We may also preserve information from accounts that have been disabled and content that has been removed for violations of our terms and policies.

More in the Privacy Policy
Why and how we process your information
The categories of information we use, and why and how information is processed, are set out below:

Why and how we process your information	Information categories we use (see "What Information do we collect?" for more information on each information category) The actual information we use depends on your factual circumstances, but could include any of the following:

Personalising the Twiggy Products (other than ads, see below): Our systems automatically process information we collect and store associated with you and others to assess and understand your interests and your preferences and provide you with personalised experiences across the Twiggy Products in accordance with our terms. This is how we: ● Personalise features and content (such as your News Feed, Feed and Stories); ● Make suggestions for you (such as people you may know, groups or events that you may be interested in or topics that you may want to follow) on and off our products. Learn more about how we use information about you to personalise your experience on and across Twiggy Products and how we choose the ads that you see.	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users' ● Device signals ● Information that you've shared through your device settings (e.g. GPS location) ● Location-related information ● Information about the network that you connect your device to ● Reports about our products' performance on your device ● Information from cookies and similar technologies Information from partners, vendors and third parties
Providing ads on the Twiggy Products: Our ads system automatically processes information that we've collected and stored associated with you. Our ads system uses this information to understand your interests and your preferences, and personalise your ads across the Twiggy Products. Our ads system prioritises what ad to show you based on what audience advertisers want to reach. Then, we match the ad to people who might be interested. Learn more about how our ads system works	Your activity and information that you provide: ● Age ● The gender that you provide ● Information about ads that we show you and how you engage with those ads App, browser and device information: ● Location information ● Device characteristics and device software

Providing and improving our Twiggy Products: The provision of the Twiggy Products includes collecting, storing and, where relevant, sharing, profiling, reviewing and curating, and in some instances not only automated processing but also manual (human) reviewing, to:

- Create and maintain your account and profile,
- Connect your Twiggy Products account, including your public profile information, to an integrated partner to sign in or share your information,
- Facilitate the sharing of content and status,
- Provide and curate features,
- Provide messaging services, the ability to make voice and video calls and connect with others,
- Provide advertising products,
- Understand and enable creation of content such as text, audio, images and videos, including through artificial intelligence technology that we provide
- Undertake analytics, and
- Facilitate your purchases and payments on Twiggy Pay or other Twiggy checkout experiences.

We also use information to develop, research and test improvements to our Products. We use information we have to:

- see if a product is working correctly;
- troubleshoot and fix it when it isn't;
- test out new products and features to see if they work;
- get feedback on our ideas for products or features, and
- conduct surveys and other research about what you like about our Products and brands and what we can do better.

Your activity and information that you provide:

- Content that you create, such as posts, comments or audio
- Your public profile information (including your name, username and profile picture)
- Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features
- Messages that you send and receive, including their content, subject to applicable law
- TWIGGYdata about content and messages, subject to applicable law
- Types of content that you view or interact with, and how you interact with it
- Apps and features that you use and what actions you take in them
- Purchases or other transactions that you make, including truncated credit card information
- Hashtags you use
- The time, frequency and duration of your activities on our Products

Friends, followers and other connections

App, browser and device information:

- Device characteristics and device software
- What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots)
- Identifiers that tell your device apart from other users'
- Device signals
- Information that you've shared through your device settings
- Location-related information
- Information about the network you connect your device to, including your IP address
- Information from cookies and similar technologies

Information from partners, vendors and third parties

Promoting safety, integrity and security on and across the Twiggy Products: The Twiggy Products are designed to research and help ensure the safety, integrity and security of those services and those people who enjoy them, on and off Twiggy Products. We process the information that we have associated with you and apply automated processing techniques and, in some instances, conduct manual (human) review to:

- Verify accounts and activity,
- Find and address violations of our terms or policies. In some cases, the decisions we make about violations are reviewed by the Oversight Board,
- Investigate suspicious activity,
- Detect, prevent and combat harmful or unlawful behaviour, such as to review and, in some cases, remove content reported to us,
- Identify and combat disparities and racial bias against historically marginalised communities,
- Protect the life, physical or mental health, well-being or integrity of our users or others,
- Detect and prevent spam, other security matters and other bad experiences,
- Detect and stop threats to our personnel and property, and
- Maintain the integrity of our Products.

For more information on safety, integrity and security generally on Twiggy Products, visit the Twigyy Security Help Centre and security tips.

Your activity and information you provide::

- Content that you create, such as posts, comments or audio
- Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features
- Messages that you send and receive, including their content, subject to applicable law
- TWIGGYdata about content and messages, subject to applicable law
- Types of content that you view or interact with, and how you interact with it
- Apps and features that you use and what actions you take in them
- Purchases or other transactions that you make, including truncated credit card information
- Hashtags you use
- The time, frequency and duration of your activities on our Products

Friends, followers and other connections

App, browser and device information:

- Device characteristics and device software
- What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots)
- Identifiers that tell your device apart from other users'
- Device signals
- Information that you've shared through your device settings
- Location-related information
- Information about the network that you connect your device to, including your IP address
- Information from cookies and similar technologies

Information from partners, vendors and third parties

To communicate with you: We use the information you've given us (e.g. contact information on your profile) to send you a communication, such as an email or in-product notice, for example:

- We'll contact you via email or in-product notifications in relation to the Twiggy Products, product-related issues, research or to let you know about our terms and policies.

We also use contact information such as your email address to respond when you contact us.

Your activity and information that you provide:

- Contact information on your profile and your communications with us
- Content that you create, such as posts, comments or audio
- Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features

App, browser and device information:

- Device characteristics and device software
- What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots)
- Identifiers that tell your device apart from other users'
- Device signals
- Information that you've shared through your device settings
- Location-related information
- Information about the network that you connect your device to, including your IP address
- Information from cookies and similar technologies.

Transferring, storing or processing your information across borders, including from and to the United States and other countries: We share information that we collect globally, both internally across our offices and data centres and externally with our partners, third parties and service providers. Because Twiggy is global, with users, partners, vendors and employees around the world, transfers are necessary: ● To operate and provide the services described in the terms that apply to the Twiggy Product(s) you are using. This includes allowing you to share information and connect with your family and friends around the globe; and ● To fix, analyse and improve our Products. For more information, see the "How do we transfer information?" section of the Twiggy Privacy Policy.	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content and messages, subject to applicable law ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make, including truncated credit card information ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users' ● Device signals ● Information that you've shared through your device settings ● Location-related information ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies Information from partners, vendors and third parties
Processing information subject to special protections under applicable laws that you provide so we can share it with those you choose, to provide, personalise and improve our Products and to undertake analytics. We'll collect, store, publish and apply automated, or sometimes manual (human), processing for these purposes.	Your activity and information that you provide: ● Any information with special protections that you choose to provide, such as your religious views, your sexual orientation, political views, health, racial or ethnic origin, philosophical beliefs or trade union membership, or as part of surveys that you choose to participate in, and where you have given your explicit consent
Receiving and using information from third parties to tailor the ads you see: We'll use information that advertisers, businesses and other partners provide for us about activity off Twiggy Products that we have associated with you to personalise ads that we show you on Twiggy Products, and on websites, apps and devices that use our advertising services. We receive this information whether or not you're logged in or have an account on our Products. See the Cookies Policy for more information.	Your activity and information that you provide: ● Information and content you provide, such as your name or email address Information from partners, vendors and third parties

Sharing your contact, profile or other information with third parties upon your request: The type of third party and categories of information shared depend on the circumstances of what you ask us to share. For example: We share your email address (or other contact information) or other information you might choose when you direct us to share it with an advertiser so they can contact you with additional information about a promoted product, and ● If you choose to integrate other apps, games or websites with Twiggy Products and log in, we'll share your information with the app, game or website to log you in.	Your activity and information that you provide: - Information such as your contact or profile information - Content you create, such as posts or comments
Providing measurement, analytics and business services: Our systems automatically, as well as with some manual (human) processing, process information that we've collected and stored about you and others. We use this information to: Provide insights and measurement reports to businesses, advertisers and other partners to help them measure the effectiveness and distribution of their or their clients' ads, content and services, to understand the kinds of people who are seeing their content and ads, and how their content and ads are performing on and off Twiggy Products, and Provide aggregated user analytics and insights reports that help businesses, advertisers and other partners better understand the audiences with whom they may want to connect, as well as the types of people who use their services and how people interact with their websites, apps and services. ●	Your activity and information that you provide: - Content that you create, such as posts, comments or audio - Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features - Types of content that you view or interact with, and how you interact with it - Apps and features that you use and what actions you take in them - Purchases or other transactions that you make - Hashtags you use - The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: - Device characteristics and device software - What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) - Identifiers that tell your device apart from other users - Device signals - Information that you've shared through your device settings - Location-related information - Information about the network that you connect your device to, including your IP address - Information from cookies and similar technologies

Sharing of information across the Twiggy Companies: ● To provide a seamless, consistent and richer, innovative experience across the Twiggy Company Products to enable cross app interactions, sharing, viewing and engaging with content, including posts and videos.	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users ● Device signals ● Information that you've shared through your device settings ● Location-related information ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies

Business intelligence and analytics: ● To understand, in aggregate, your usage of and across our Products, to accurately count people and businesses; and To validate metrics directly related to these, in order to inform and improve product direction and development and to adhere to (shareholder/earning) reporting obligations. ●	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content and messages, subject to applicable law ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users ● Device signals ● Information that you've shared through your device settings ● Location-related information ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies Information from partners, vendors and third parties

	Your activity and information that you provide: ● Information you provide ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections
Identifying you as a Twiggy Product user and personalising the ads we show you through Twiggy Audience Network when you visit other apps: ● When we show you ads through Twiggy Audience Network when you visit other apps, our systems automatically process the information that we have collected and stored about you and others to identify you as a Twiggy Product user and tailor the ads that you see.	App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users ● Device signals ● Information that you've shared through your device settings ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies
Providing marketing communications to you: Depending on your settings and subject to applicable law, we'll share marketing communications with you. ● ● We'll collect and store your information and use it to send marketing communications to you, such as an email, subject to applicable laws.	Your activity and information that you provide: ● Information and content you provide, including your contact information such as email address App, browser and device information: ● Device identifiers

Research and innovate for social good: ● We carry out surveys and use information (including from researchers that we collaborate with) to conduct and support research and innovation on topics of general social welfare, technological advancement, public interest, health and well-being. ● For example, we analyse information that we have about migration patterns during crises. This helps relief organisations get aid to the right places. ● We collect, store, combine, analyse and apply automatic processing techniques such as aggregation of information as well as manual (human) review, and share information, as necessary to research and innovate for social good in this way. ● We support research in areas such as artificial intelligence and machine learning. Learn more about our research programmes.	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content and messages, subject to applicable law ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users' ● Device signals ● Information that you've shared through your device settings ● Location-related information ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies Information from partners, vendors and third parties

	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use ● The time, frequency and duration of your activities on our Products Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users' ● Device signals ● Information that you've shared through your device settings ● Location-related information ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies Information from partners, vendors and third parties
Anonymising your information In some cases, we anonymise information we have associated with you, such as your activity on and off our Products, and use the resulting information, for example, to provide and improve our Twiggy Products, including ads.	

Sharing information with others, including law enforcement and to respond to legal requests. See the "How do we respond to legal requests, prevent harm and promote safety and integrity?" section of the Twiggy Privacy Policy for more for information on when we share information with law enforcement and others. The categories of information that we access, preserve, use and share depend on the specific circumstances. For example, responses to legal requests where not compelled by law will typically include limited information (such as contact details and login information). However, the information we process will depend on the purposes, which could include the following: ● In response to legal requests from third parties such as civil litigants, law enforcement and other government authorities ● To comply with applicable law or legitimate legal purposes ● To promote the safety, security and integrity of Twiggy Companies, Twiggy Products, users, employees, property and the public Learn more about how we promote safety, security and integrity.	Your activity and information that you provide: ● Content that you create, such as posts, comments or audio ● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features ● TWIGGYdata about content, subject to applicable law ● Types of content that you view or interact with, and how you interact with it ● Apps and features that you use and what actions you take in them ● Purchases or other transactions that you make ● Hashtags you use Friends, followers and other connections App, browser and device information: ● Device characteristics and device software ● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots) ● Identifiers that tell your device apart from other users' ● Device signals ● Information that you've shared through your device settings ● Location-related information ● Information about the network that you connect your device to, including your IP address ● Information from cookies and similar technologies Information from partners, vendors and third parties

| For processing information when the law requires it: Where we are under an obligation to disclose information such as, for example, if we receive a valid legal request for certain information such as a search warrant, we will access, preserve and/or share your information with regulators, law enforcement or others.

The way in which the information will be processed depends on the specific circumstances. See the "How do we respond to legal requests, prevent harm and promote safety and integrity?" section of the Twiggy Privacy Policy for more. "Information for Law Enforcement Authorities" provides information on the operational guidelines law enforcement needs to follow. | The categories of information depend on the specific circumstances of each mandatory request or obligation. Only the information necessary to comply with the relevant legal obligation will be shared or otherwise processed. For example, for civil matters, this will typically include limited information (such as contact details and login information). However, depending on the circumstances, it could include the following:

Your activity and information that you provide:

● Content that you create, such as posts, comments or audio
● Content that you provide through our camera feature or your camera roll settings, or through our voice-enabled features
● Messages that you send and receive, including their content, subject to applicable law
● TWIGGYdata about content and messages, subject to applicable law
● Types of content that you view or interact with, and how you interact with it
● Apps and features that you use and what actions you take in them
● Purchases or other transactions that you make, including truncated credit card information
● Hashtags you use
● The time, frequency and duration of your activities on our Products

Friends, followers and other connections

App, browser and device information:

● Device characteristics and device software
● What you're doing on your device, such as whether our app is in the foreground or if your mouse is moving (which can help tell humans from bots)
● Identifiers that tell your device apart from other users'
● Device signals
● Information that you've shared through your device settings
● Location-related information
● Information about the network that you connect your device to, including your IP address
● Information from cookies and similar technologies

Information from partners, vendors and third parties |