

PRIVACY POLICY FOR FLAS™ DBA Vfycred

FLAS LLC DBA Vfycred (“Company” “we” or “us” or “our”) respects the privacy of its users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit the FLAS™ website and mobile application (individually and collectively, the “Service”). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE SITE.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Service after the date such revised Privacy Policy is posted.

Definitions

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

“Account” means a unique account created for you to access our Service or parts of our Service.

“Affiliate” means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

“Application” or “App” means the software program provided by the Company downloaded by you on any electronic device.

“Business,” for the purpose of the California Consumer Privacy Act (“CCPA”), refers to the Company as the legal entity that collects Consumers' personal information and has the meaning set forth in CCPA § 1798.140(c).

“Consumer,” for the purpose of the CCPA, means a natural person who is a California resident and has the meaning set forth in CCPA § 1798.140(g).

“Cookies” are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.

“Device” means any device that can access the Service such as a computer, a cellphone or a digital tablet.

“Do Not Track” (“DNT”) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

“Personal Information” is any information that relates to an identified or identifiable individual. For the purposes of the CCPA, Personal Information means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with you and has the meaning set forth in CCPA § 1798.140(o).

“Sale,” for the purpose of the CCPA means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer’s Personal Information to another business or a third party for monetary or other valuable consideration and has the meaning set forth in CCPA § 1798.140(t).

“Service” refers to the Application and Website, individually and collectively.

“Service Provider” means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies and individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

“Third-party Social Media Service” refers to any website or any social network website through which a User can log in or create an account to use the Service.

“Usage Data” refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

“Website” refers to the FLAS website, accessible at _____.

“You” and “you” means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the Service depends on the content and materials you use, and includes:

Personal Information

Demographic and other personally identifiable information (such as your name and email address) that you voluntarily give to us when choosing to participate in various activities related to the Service, such as making a purchase, registering an account, sending feedback or responding to surveys. If you choose to share data about yourself via your profile or other interactive areas of the Service, please be advised that all data you disclose in these areas is public and your data will be accessible to anyone who accesses the Service.

Health Insurance Portability & Accountability Act (“HIPAA”) Data

Some of the information collected by FLAS in the course of your use of the Service may include “protected health information” (“PHI”) as defined by HIPAA. FLAS acts as a “Business Associate” as defined by HIPAA. When it receives personally identifiable information about you from a healthcare provider, such information is PHI and FLAS’s use of such PHI is governed by HIPAA. Data that you provide to FLAS directly, *e.g.*, by creating an account, is not considered PHI and FLAS’s use such data is not governed by HIPAA.

HIPAA provides protections for the security and privacy of your PHI. FLAS may only use and disclose PHI as permitted by your healthcare provider or as authorized by you.

Derivative Data

Information our servers automatically collect when you access the Service, such as your native actions that are integral to the Service, as well as other interactions with the Service via server log files.

Financial Data

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, or request information about our goods or services from the Service.

Data from Social Networks

User information from social networking sites, such as Facebook, Instagram, Pinterest, or Twitter, including your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks. This information may also include the contact information of anyone you invite to use and/or join the Service.

More specifically, but without limitation, we provide you with the option to register or access the Service using social media account details, like your Facebook, Twitter or other social media account. We may collect information regarding your geo-location, mobile device, push notifications, and Facebook permissions when you use our apps.

We may also collect the following information:

- **Geo-Location Information.** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's Universally Unique Identifier (UUID), storage, reminders, notifications, social media accounts and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.
- **Push Notifications.** We may ask to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
- **Facebook & Twitter Permissions.** By default we access your Facebook and Twitter basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page and the [Twitter Privacy Policy](#).

Information collected from other Sources

We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social

media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

Geo-Location Information

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Service, to provide location-based services and for other purposes. If you wish to change our access or permissions, you may do so in your device's settings.

Push Notifications

We may request to send you push notifications regarding your account or the Service. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

Third-Party Data

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Service permission to access this information.

Data From Contests, Giveaways, and Surveys

Personal and other information you may provide when entering sweepstakes, games, tournaments, contests or giveaways and/or responding to surveys.

USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Service to:

1. Administer sweepstakes, promotions, games and contests.
2. Respond to a subpoena.
3. Compile anonymous statistical data and analysis for use internally or with third parties.
4. Create and manage your account.
5. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Service to you.
6. Email you regarding your account or order.

7. Enable user-to-user communications.
8. Fulfill and manage purchases, orders, payments, and other transactions related to the Service.
9. Generate a personal profile about you to make future visits to the Service more personalized.
10. Increase the efficiency and operation of the Service.
11. Monitor and analyze usage and trends to improve your experience with the Service.
12. Notify you of updates to the Service
13. Offer new products, services, mobile applications, and/or recommendations to you.
14. Perform other business activities as needed.
15. Process payments and refunds.
16. Request feedback and contact you about your use of the Service.
17. Resolve disputes and troubleshoot problems.
18. Respond to product and customer service requests.
19. Send you marketing materials.
20. Solicit support for the Service.

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

Third-Party Service Providers

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

Marketing Communications

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

Third-Party Advertisers

We may use third-party advertising companies to serve ads when you visit the Service. These companies may use information about your visits to the Service and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include any subsidiaries, business partners or other companies that we control or that are under common control with us.

Business Partners

We may share your information with our business partners to offer you certain products, services or promotions.

Social Media Contacts

If you connect to the Service through a social network, your contacts on the social network may see your name, profile photo, and descriptions of your activity.

Other Third Parties

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the acquirer or successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

TRACKING TECHNOLOGIES

Cookies and Web Beacons

We use cookies, web beacons, tracking pixels, and other tracking technologies on the Service to help customize the Service and improve your experience. When you access the Service, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Service. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

Internet-Based Advertising

Additionally, we may use third-party software to serve ads on the Service, implement email marketing campaigns, and manage other interactive marketing initiatives, including, without limitation, Google AdMob and Facebook Audience Network. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us. For more information about opting-out of interest-based ads, visit the [Network Advertising Initiative Opt-Out Tool](#) or [Digital Advertising Alliance Opt-Out Tool](#).

Website Analytics

We may also partner with selected third-party vendors to allow tracking technologies and remarketing services on the Service through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Service, determine the popularity of certain content, and better understand online activity. By accessing the Service, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can install and/or update your settings for one of the following:

[Digital Advertising Alliance Opt-Out Tool](#)
[Google Analytics Opt-Out Plugin](#)
[Network Advertising Initiative Opt-Out Tool](#)
[Your Ad Choices](#)

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

THIRD-PARTY WEBSITES

The Service may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Service, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Service.

SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. We cannot guarantee complete security if you provide personal information.

POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

OPTIONS REGARDING YOUR INFORMATION

Account Information

You may at any time review or change the information in your account or terminate your account by contacting us using the contact information provided below.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms & Conditions and/or comply with legal requirements.

Emails and Communications

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Service
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

CALIFORNIA PRIVACY RIGHTS

California Consumer Privacy Act (“CCPA”)

California residents have certain rights with respect to the processing and use of their personal information, including the following rights:

The right to notice. You must be properly notified which categories of Personal Information are being collected and the purposes for which the Personal Information is being used.

The right to access / the right to request. The CCPA permits you to request and obtain from the Company information regarding the disclosure of your Personal Information that has been collected in the past 12 months by the Company or its subsidiaries to a third-party for the third party’s direct marketing purposes.

The right to say no to the sale of Personal Information. You also have the right to ask the Company not to sell your Personal Information to third parties. You can submit such a request by visiting our "Do Not Sell My Personal Information" section or web page.

The right to know about your Personal Information. You have the right to request and obtain from the Company information regarding the disclosure of the following:

- The categories of Personal Information collected;
- The sources from which the Personal Information was collected;
- The business or commercial purpose for collecting or selling the Personal Information;
- Categories of third parties with whom we share Personal Information; and
- The specific pieces of Personal Information we collected about you

The right to delete Personal Information. You also have the right to request the deletion of your Personal Information that have been collected in the past 12 months.

The right not to be discriminated against. You have the right not to be discriminated against for exercising any of your Consumer's rights, including by:

- Denying goods or services to you;
- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties;
- Providing a different level or quality of goods or services to you;
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

INFORMATION COLLECTED

CATEGORY	EXAMPLES	COLLECTED
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers	Yes
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories	Yes
Protected characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), medical records and other data covered by HIPAA	No
Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or	No

	identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Yes
Geolocation data	Physical location or movements	Yes
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	No
Professional or employment-related information	Current or past job history or performance evaluations.	No
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Yes

Personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information that is exempt from the CCPA such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from users of the Service or their agents, such as when a person voluntarily submits information to us

- Indirectly from our clients or their agents, such as when we collect information by providing goods or services to them.
- Directly and indirectly from activity on or through the Service.
- From third parties that interact with us in connection with the Service.

EXERCISING YOUR CCPA RIGHTS

In order to exercise any of your rights under the CCPA, and if you are a California resident, you can email us ccpa@_____.com or call us at [ccpa@_____](tel:ccpa@_____).com or submit the form available on this page "Do Not Sell My Personal Information"

The Company will disclose and deliver the required information free of charge within 45 days of receiving your verified request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

DO NOT SELL MY PERSONAL INFORMATION

We do not sell personal information. However, the Service Providers we partner with (for example, our advertising partners) may use technology on the Service that "sells" personal information as defined by the CCPA.

If you wish to opt out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under CCPA, you may do so by following the instructions below.

Please note that any opt out is specific to the browser you use. You may need to opt out on every browser that you use.

Website

You can opt out of receiving ads that are personalized as served by our Service Providers by clicking on the links below:

[Digital Advertising Alliance Opt-Out Tool](#)

[Google Analytics Opt-Out Plugin](#)

[Network Advertising Initiative Opt-Out Tool](#)

[Your Ad Choices](#)

The opt out will place a cookie on your computer that is unique to the browser you use to opt out. If you change browsers or delete the cookies saved by your browser, you will need to opt out again.

Mobile Devices

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to serve you ads that are targeted to your interests:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from your mobile device by changing the preferences on your mobile device.

"DO NOT TRACK" POLICY AS REQUIRED BY CALIFORNIA ONLINE PRIVACY PROTECTION ACT ("CALOPPA")

Our Service does not respond to Do Not Track signals. However, some third party websites keep track of you browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of your web browser.

CALIFORNIA BUSINESS AND PROFESSIONS CODE § 22581

California residents under the age of 18 who are registered users of online sites, services, or applications have a right under California Business and Professions Code § 22581 to remove, or request and obtain removal of, content or information they have publicly posted. To remove content or information you have publicly posted, please send a detailed description of the specific content or information you wish to have removed; see How to Contact Us below. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

HOW TO CONTACT US

If you have a privacy concern, complaint, or a question for us, please contact us at:

FLAS LLC DBA Vfycred

privacy@_____.com or (for CCPA requests) ccpa@_____.com

Unless otherwise stated, the data is processed in the United States of America and at any other location where other parties processing information are located.