

Bluwr Privacy Policy

Last update: September 1, 2023

At Bluwr Inc. (“Bluwr”, “we” or “us”), we are committed to protecting your privacy and keeping your information safe. Bluwr processes information about you in a few different ways. This Privacy Policy explains how we collect, use, disclose, and keep information that can identify you (“Personal Information”) when you create a Bluwr account, use Bluwr One (the “Site”), and other online products and services to post content to the Bluwr community, including stories and publications you create, comments and messages (collectively, the “Services”) or when you otherwise interact with us or receive a communication from us.

What is Personal Information?

"Personal Information" is any information that can identify you. This may include, but is not limited to, your username, name, bio, profile picture or image, mailing address, telephone number, email address, Internet Protocol (“IP”) address, age, gender.

What do we collect and Why do we use it?

If you’re just browsing our Site, we don’t collect any Personal Information about you. In order for you to create an account with Bluwr and use our Services, we need to collect and process some Personal Information. Depending on your use of the Services, that may include:

What we collect:	We use this Personal Information to:
Information that is necessary for the use of our Services, such as your email address, date of birth, and login credentials.	<ul style="list-style-type: none">● Create your Bluwr account and provide you with our Services● Identify you across the Services (e.g. when you sign in, post a story, or make a comment)● Provide you with technical support and customer services● Communicate with you (e.g. letting you know about upcoming changes or improvements)

	<ul style="list-style-type: none"> ● Send you marketing emails, unless you opt-out ● Display the information as part of your Bluwr profile ● Calculate anonymous, aggregate statistics to better understand our users, improve our Services, and develop new features
<p>Information we automatically collect from your use of our Services, including:</p> <ul style="list-style-type: none"> ● IP address ● Cookie data ● Device information ● Browser type and version ● Operating system ● Referral URLs ● Pages visited ● Diagnostic information in the event of errors ● Actions performed such as links clicked search terms, your posts, comments, messages and interactions with other users and other communications with us. Your content may include text, links, images, and videos. 	<ul style="list-style-type: none"> ● Personalize and customize your story discovery experience ● Measure your use and overall satisfaction with our Services ● Research and develop new services ● Calculate anonymous, aggregate statistics to better understand our users, improve our Services, and develop new features ● Investigate and prevent reported issues, illegal activity, and breaches of our terms of service ● Help prevent spam, fraud, abuse, and other prohibited activity ● For security purposes

We treat the personal information above as private by default, so it won't be displayed on the Site (unless you choose to publicly display applicable information via your account settings), revealed to other Bluwr users, or rented or sold to anyone unless the data has been anonymized.

Except for your username, login credentials, email address, IP address, and birth date which are required to create your Bluwr account, you can always opt not to disclose any Personal Information to us, but then you may be unable to use certain features on the Services.

As required by applicable law, we collect and process information about individuals in the European Economic Area only where we have a legal basis for doing so. Our legal bases depend on the Services you use and how you use them. We process your information on the following legal bases:

- You have consented for us to do so for a specific purpose;
- We need to process the information to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as preventing fraud, ensuring network and information security, enforcing our rules and policies, protecting our legal rights and interests, research and development, personalizing the Services, and marketing and promoting the Services; or
- We need to process your information to comply with our legal obligations.

You may also choose to provide other information directly to us. For example, we may collect information when you fill out a form, participate in Bluwr-sponsored activities or promotions, apply for a job, request customer support, or otherwise communicate with us.

Why do we ask for your date of birth?

Children under 13 are not permitted to use Bluwr, and so this Privacy Policy makes no provision for their use of Bluwr Services.

If you are a parent or guardian and learn that your minor child has provided us with Personal Information without your consent, please contact us at privacy@bluwr.com.

Why do we collect and use your email?

We use email as an important way to communicate with you. You can manage your email notification preferences by adjusting your preferences in the Notifications section of your account Settings. You may also opt out or unsubscribe from any future email communications from within a link provided in each email we send you. However, please note that in all cases you will continue to receive all system e-mails (e.g. those regarding forgotten user login credentials) and legal notices (e.g. updates to our policies) from us.

Why do we collect information from cookies and similar technologies?

We may receive information from cookies, which are pieces of data your browser stores and sends back to us when making requests, and similar technologies. We

use this information to improve your experience, understand user activity, personalize content, and improve the quality of our Services. Cookies allow us to “remember” what you have done before and personalize the Service for you, and the automatically collected data provides us with Site usage statistics and other traffic data that is used to help diagnose problems, analyze trends and administer the Site and the Services.

What can other Bluwr users see?

Our Services are designed to help you share information with the Bluwr community. Any personal information that you voluntarily choose to include in a publicly accessible area of the Service will be available to anyone who has access to that content, such as your username, name, the description you create, and your location, as well as the messages you post, whether on your profile, on our forums or to other users, stories and publications you write, and many other bits of information that result from your use of the Services.

We may use this information to make inferences, like what topics you may be interested in, to develop new products and services for the Bluwr community, and to customize the content we show you.

How do we share your Personal Information?

We may share your Personal Information with third-party service providers, but only where it’s necessary to provide any of the Services to you (e.g., email providers, server providers, etc.). When we share data with third-party services that support our delivery of the Services, we require that they protect your Personal Information to the same standards we do.

We do not and will not release, rent or sell your Personal Information, except in the following very limited situations:

- To comply with an applicable law (including investigations of any crime), regulation, legal process or enforceable governmental request;
- To enforce or apply our Terms of Service and other policies, including investigation of potential violations;
- To protect the rights, property, or safety of Bluwr, our employees, our users, or the public;

- If Bluwr is involved in a merger, acquisition or asset sale, in which case we will continue to ensure the confidentiality of any Personal Information and give affected users notice before Personal Information is transferred or becomes subject to a different privacy policy.

We never post anything to your Facebook or other third-party accounts without your permission.

Where do we store your Personal Information?

Our Services are mainly provided from our offices in Canada. However, Personal Information that you submit through the Services may be transferred to countries other than where you reside (for example, to servers in the United States and Europe) for processing and storage. In addition, our third-party service providers also may process or store your Personal Information on servers outside your country, including in Canada or the US.

By using any of the Services, or submitting any Personal Information via the Services, you authorize Bluwr and its authorized service providers to use and process your Personal Information in these countries. Please be aware that the privacy protections and the rights of authorities and Government agencies to access your personal information in some of these countries may not be equivalent to those in your country.

How can you access your personal information?

If you wish to access any Personal Information that we hold about you, or request that we correct or delete the Personal Information that we hold about you, you may contact us via email at privacy@bluwr.com. We will comply with such requests to the extent required by law or our policies, and subject to any limitations in our systems.

To access, modify or delete the Personal Information you have provided to us, please log in and update your profile.

How does Bluwr protect your Personal Information?

We are continuously implementing and updating physical, organizational, contractual and technological security measures to protect your Personal Information from partial or complete loss, accidental or intentional manipulation, theft, unauthorized access, disclosure, copying, use or modification. At Bluwr, we support encryption on all transmissions to protect Personal Information submitted on our Site. Our security measures are continuously improved in line with technological developments.

What happens to your Personal Information when you leave Bluwr?

If you close your account, it will first be deactivated for a period of 3 months. When your account is deactivated, while it is not viewable on Bluwr, all of your public contributions and comments to the Bluwr community will remain (except that they will be anonymized).

For 3 months after deactivation, it is still possible to restore your account if it was accidentally or wrongfully deactivated, including re-associating your comments and contributions to your profile. After 6 months, we permanently delete your Personal Information from our systems, except that your anonymized comments and contributions will remain on the Service.

Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent; in other cases, please note that your continued use of the Services after any change means that you agree with, and consent to be bound by, the revised Privacy Policy. If you disagree with any changes in this Privacy Policy and do not wish your Personal Information to be subject to the revised Policy, you will need to close your account and/or stop using the Services.

Your Rights

If you wish to exercise any of the rights listed below, please contact us at the address reproduced below.

- Right to confirmation and right of access - We will gladly confirm whether we are processing any of your Personal Information, which data we are processing, and for what purpose we are processing it.
- Right to rectification - If any of the data we have stored is incorrect, we would certainly be happy to correct it.
- Right to erasure - Should you wish your Personal Information to be deleted, we will comply with your request as far as legally possible.
- Right to restriction of processing - Should you wish to restrict use, we will comply with your request as far as legally possible.
- Right to withdraw your consent - Should you wish to revoke any previously granted consent, we will comply with your request. Revocation does not affect the permissibility of the processing of your data up to now.

How to contact us

If you have any questions or concerns about this Privacy Policy, please contact us at privacy@bluwr.com.