

# Girl Talk Privacy Policy

**Effective November 22, 2020. Last Updated November 22, 2020.**

We want you to understand how and why We Need to Girl Talk, LLC. ("Girl Talk," "we" or "us") collects, uses, and shares information about you when you use our sites, and other online products and services (collectively, the "Services") or when you otherwise interact with us or receive a communication from us. This Privacy Policy applies to all of our Services.

## What We Collect (and How it is Used and Shared)

### Information You Provide to Us

We collect information you provide to us directly when you use the Services. This includes:

#### Account information

If you create a Girl Talk account, we may require you to provide an email, username and password. Your username is public, and it doesn't have to be related to your real name. You may also provide other account information, like an icon. We also store your user account preferences and settings.

#### Content you submit

We collect the content you submit to the Services. This includes your posts and comments including saved drafts, your messages with other users (e.g., private messages), and your reports and other communications with moderators and with us. Your content may include text, links, images, gifs, and videos.

#### Actions you take

We collect information about the actions you take when using the Services. This includes your interactions with content, like posting and commenting. We collect your interactions, like your subscriptions or moderator status.

#### Transactional information

If you purchase products or services from us (e.g., Girl Talk Premium), we will collect certain information from you, including your name, address, email address, and information about the product or service you are purchasing. Girl Talk uses industry-standard payment processor services (for example, Stripe) to handle payment information.

#### Other information

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

#### Information We Collect Automatically

When you access or use our Services, we may also automatically collect information about you. This includes:

##### Log and usage data

We may log information when you access and use the Services. This may include your IP address, user-agent string, browser type, operating system, referral URLs, device information (e.g., device IDs), device settings, pages visited, links clicked, the requested URL, and search terms. Except for the IP address used to create your account, Girl Talk will delete any IP addresses collected after 100 days.

##### Location information

We may receive and process information about your location. We may also receive location information from you when you choose to share such information on our Services, including by associating your content with a location, or we may derive your approximate location from other information about you, including your IP address.

#### Information Collected from Other Sources

We may receive information about you from other sources, including from other users and third parties, and combine that information with the other information we have about you. For example, we may receive demographic or interest information about you from third parties, including advertisers (such as the fact that an advertiser is interested in showing you an ad), and combine it with our own data using a common account identifier such as a hash of an email address or a mobile-device ID. You can control how we use this information to personalize the Services for you as described in “Your Choices - Controlling Advertising and Analytics” below.

#### Linked services

If you authorize or link a third-party service (e.g., an unofficial mobile app client) to access your account, Girl Talk receives information about your use of that service when it uses that authorization. Linking services may also cause the other service to send us information about your account with that service. For example, if you sign in to Girl Talk with a third-party identity provider, that provider may share an email address with us. To learn how information is shared with linked services, see “How Information About You Is Shared” below.

## Information Collected by Third Parties

### Embedded content

Girl Talk displays some linked content in-line on the Girl Talk services via “embeds.” For example, Girl Talk posts that link to YouTube or Twitter may load the linked video or tweet within Girl Talk directly from those services to your device so you don’t have to leave Girl Talk to see it. In general, Girl Talk does not control how third-party services collect data when they serve you their content directly via these embeds. As a result, embedded content is not covered by this privacy policy but by the policies of the service from which the content is embedded.

### Audience measurement

We partner with audience measurement companies (including Quantcast) to learn demographic information about the population that uses Girl Talk. To provide this demographic information, these companies collect cookie information to recognize your device.

We use information about you to:

- Provide, maintain, and improve the Services;
- Research and develop new services;
- Help protect the safety of Girl Talk and our users, which includes blocking suspected spammers, addressing abuse, and enforcing the Girl Talk User Agreement and our other policies;
- Send you technical notices, updates, security alerts, invoices, and other support and administrative messages;
- Provide customer service;
- Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you (for information about how to opt out of these communications, see “Your Choices” below);
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Measure the effectiveness of ads shown on our Services; and
- Personalize the Services, and provide and optimize advertisements, content, and features that match user profiles or interests.

When you submit content (including a post, or comment) users of our Services will be able to see that content, the username associated with the content, and the date and time you originally submitted the content.

Your Girl Talk account has a profile page that is accessible to other users of the Services. Your profile contains information about your activities on the Services, such as your username, prior posts and comments, moderator status, Girl Talk Premium status.

Girl Talk only shares nonpublic information about you in the following ways. We do not sell this information.

- *With your consent.* We may share information about you with your consent or at your direction.
- *With linked services.* If you link your Girl Talk account with a third-party service, Girl Talk will share the information you authorize with that third-party service. You can control this sharing as described in "Your Choices" below.
- *With our service providers.* We may share information with vendors, consultants, and other service providers who need access to such information to carry out work for us. Their use of personal data will be subject to appropriate confidentiality and security measures. A few examples: (i) payment processors who process transactions on our behalf, (ii) cloud providers who host our data and our services, (iii) third-party ads measurement providers who help us and advertisers measure the performance of ads shown on our Services.
- *To comply with the law.* We may share information in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process, or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, we will attempt to provide you with prior notice before disclosing your information in response to such a request.
- *In an emergency.* We may share information if we believe it's necessary to prevent imminent and serious bodily harm to a person.
- *To enforce our policies and rights.* We may share information if we believe your actions are inconsistent with our User Agreement, rules, or other Girl Talk policies, or to protect the rights, property, and safety of ourselves and others.
- *With our affiliates.* We may share information between and among Girl Talk, and any of our parents, affiliates, subsidiaries, and other companies under common control and ownership.
- *Aggregated or de-identified information.* We may share information about you that has been aggregated or anonymized such that it cannot reasonably be used to identify you.

## How We Protect Your Information

We take measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. We also enforce technical and administrative access controls to limit which of our employees have access to nonpublic personal information.

We store the information we collect for as long as it is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.

## Your Choices

You have choices about how to protect and limit the collection, use, and sharing of information about you when you use the Services. Some of these choices are available to everyone who uses Girl Talk, while others only apply if you have a Girl Talk account.

## Your Rights

### Data Subject and Consumer Information Requests

Requests for a copy of the information Girl Talk has about your account can be submitted.

All other data subject and consumer requests under data protection laws should be sent via email to [hello@weneedtogirltalk.com](mailto:hello@weneedtogirltalk.com) from the email address that you have verified with your Girl Talk account.

Before we process a request from you about your personal information, we need to verify the request via your access to your Girl Talk account or to a verified email address associated with your Girl Talk account. You may also designate an authorized agent to exercise these rights on your behalf. Girl Talk does not discriminate against users for exercising their rights under data protection laws to make requests regarding their personal information.

### Additional Information for California Users

The California Consumer Privacy Act (“CCPA”) requires us to provide California residents with some additional information about the categories of personal information we collect and share, where we get that personal information, and how and why we use it.

If you are a California resident, you have additional rights under the CCPA, including the right to request access to or deletion of your personal information, and information about our data practices, as well as the right not to be discriminated against for exercising your privacy rights. These rights can be exercised as described in the Data Subject and Consumer Information Requests section above.

## Children

Children under the age of 18 are not allowed to create an account or otherwise use the Services.

## Changes to This Policy

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. If the changes, in our sole discretion, are material, we may also notify you by sending an email to the address associated with your account (if you have chosen to provide an email address) or by otherwise providing notice through our Services. We encourage you to review the Privacy Policy whenever you access or use our Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. By continuing to use our Services after Privacy Policy changes go into effect, you agree to be bound by the revised policy.

## Contact Us

If you have other questions about this Privacy Policy, please contact us at [hello@weneedtogirltalk.com](mailto:hello@weneedtogirltalk.com) or at:

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