

# Pole Position Privacy Policy

## Scope of this Privacy Policy

IndyWork, Inc. (“**Pole Position**,” “**we**,” “**our**,” and/or “**us**”) values the privacy of individuals who use our application, websites, and related services (collectively, our “**Sites**,” “**Pole Position Platform**,” “**Platform**”). This privacy policy (the “**Privacy Policy**”) explains how we collect, use, and share information from Pole Position users (“**Users**”), comprised of both of any dancer using the service (“**Dancers**,” “**you**”) and Adult Entertainment Establishments (“**Clubs**”). Beyond the Privacy Policy, your use of Pole Position is also subject to our Terms of Service.

## Information We Collect

### A. Information You Provide to Us

**Registration Information.** When you sign up for a Pole Position account, you give us your name, email address, and phone number. If you decide to sign up for Pole Position using your Facebook account, we will also get basic information from your Facebook profile like your name, gender, profile photo, and Facebook friends.

**User Profile Information.** When you join the Pole Position community, you will create Pole Position Profile (“**Profile**”) to provide information essential to requesting a booking (“**Booking**”) with a Club. Filling out a profile is required, however the level of information required will vary Club by Club. Your name and photos are always part of your Profile and are required in order to use the Services provided by Pole Position. Read more below about how you can control who sees your Profile.

**Payment Method.** When you add a credit card or payment method to your Pole Position account, a third party that handles payments for us will receive your card information. To keep your financial data secure, we do not store full credit card information on our servers.

**Communications.** If you contact us directly, we may receive additional information about you. For example, when you contact Pole Position, we will receive your name, email address, phone number, the contents of a message or attachments that you may send to us, and other information you choose to provide.

### B. Information We Collect When You Use the Pole Position Platform

**Location Information.** Pole Position is about connecting Dancers and Clubs by location. To do this, we need to know where you are. When you open Pole Position on your mobile device, we receive your location. We may also collect the precise location of your device when the app is running in the foreground or background. If you label certain locations, such as “home” and “work,” we receive that information, too.

Your location information is necessary for things like matching you with nearby Clubs, determining proximity and preferences, and suggesting Clubs based on previous Bookings. Also, if the need ever arises, our team may use and share location information to help protect the safety of Pole Position Users or a member of the public. In addition to the reasons described above, if you give us permission through your device settings or Pole Position app, we may collect your location while the app is off to identify promotions or service updates in your area.

**Transfer of Location Information.** The information we collect may be stored and processed in your region, in the United States, or in any other country where we or our affiliates, subsidiaries, or service providers maintain facilities. The processing locations are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect information in the event of an outage or other problem. We take steps designed to ensure that the information we collect under this statement is processed according to the provisions of this statement and applicable law wherever the information is located.

**Device Information.** Pole Position receives information from Users’ devices, including IP address, web browser type, mobile operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, push notification tokens, and, if you register with your Facebook account, your Facebook identifier.

**Usage Information.** To help us understand how you use the Pole Position Platform and to help us improve it, we automatically receive information about your interactions with the Pole Position Platform, like the pages or other content you view, your actions within the Pole Position app, and the dates and times of your visits.

**Text Information.** We work with a third-party partner to facilitate communication between Dancers and Clubs who have been connected for a Booking. We receive information about these communications, including but not limited to, the content and duration. For security purposes, we may also monitor and/or record the contents of messages sent on the Pole Position Platform, such as those between Dancers and Clubs.

**User Feedback.** At Pole Position, we want to make sure Users are enjoying the experience. We have a comment section to provide us with your feedback.

**Information from Cookies and Similar Technologies.** We collect information through the use of “cookies”, tracking pixels, and similar technologies to understand how you navigate through the Pole Position Platform and interact with Pole Position advertisements, to learn what content is popular, and to save your preferences. Cookies are small text files that web servers place on your device; they are designed to store basic information and to help websites and apps recognize your browser. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use the Pole Position Platform. You should consult your web browser(s) to modify your cookie settings. Please note that if you delete or choose not to accept cookies from us, you may be missing out on certain features of the Pole Position Platform.

## **C. Information We Collect from Third Parties**

**Third Party Services.** If you choose to register for Pole Position or otherwise link your Pole Position account with a third party’s service (such as Facebook), we may receive the same type of information we collect from you (described above) directly from those services.

**Third Party Partners.** We may receive additional information about you, such as demographic data, payment information, or fraud detection information, from third party partners and combine it with other information that we have about you.

**No Background Information on Dancers or Clubs.** Pole Position does not work with third party providers to perform background checks for either Dancers or Clubs. It is up to the discretion of either party to conduct these checks and we encourage discretion when evaluating Bookings.

## **How We Use the Information We Collect**

We use the information we collect from all Users to:

- Connect Dancers with Clubs;
- Provide, improve, expand, and promote the Pole Position Platform;
- Analyze how the Pole Position community uses the Pole Position Platform;
- Communicate with you, either directly or through one of our partners, including for marketing and promotional purposes;
- Personalize the Pole Position experience for you;
- Send you push notifications;
- Facilitate communication; and
- Provide you with customer support regarding Bookings.

# How We Share the Information We Collect

## A. Sharing Between Users

**Sharing between Dancers and Clubs.** Dancers and Clubs that confirm a Booking are able to see basic information about each other, such as names, photo, ratings, and any information they have added to their Profiles. Dancers see the club location that the Club has provided.

Although we help Dancers and Clubs communicate with one another to request a Booking, we do not share your actual phone number or other contact information with other Users. If you report a lost or found item to us, we will seek to connect you with the relevant Club or Dancer, including sharing actual contact information with your permission.

## B. Sharing Between Pole Position and Third Parties

**API and Integration Partners.** If you connect to the Pole Position Platform through an integration with a third-party service, we may share information about your use of the Pole Position Platform with that third party. We may share your information with our third-party partners in order to receive additional information about you. We may also share your information with third party partners to create offers that may be of interest to you.

**Third Party Services.** The Pole Position Platform may allow you to connect with other websites, products, or services that we do not have control over (for example, we may give you the ability to order clothing or accessories from a boutique from within the Pole Position app). If you use these services, we will provide the third party with information about you to allow them to provide the service to you. We cannot speak to the privacy practices of these third parties, and we encourage you to read their privacy policies before deciding whether to use their services. We do not retain any liability nor do we guarantee the security of information once it is passed on to a third-party service.

**Links to Other Websites.** Our Services contain links to other websites or services that are not owned or controlled by Indywork, Inc. including links to websites of retail establishments and retail establishments affiliates and advertisers, and other business partners. This Policy only applies to information collected by our Services. We have no control over these third-party websites, and your use of third-party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third-party websites linked to our Services. Your use of third parties' websites linked to our Services is at your own risk, so we encourage you to read the privacy policies of any linked third-party websites when you leave one of our Services.

**Service Providers.** We work with third party service providers to perform services on our behalf, and we may share your information with such service providers to help us provide the Pole Position Platform, including all of the things described in Section 3 above.

**Other Sharing.** We may share your information with third parties in the following cases:

- While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets;
- If a government authority requests information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process;
- With law enforcement officials, government authorities, or third parties if we think doing so is necessary to protect the rights, property, or safety of the Pole Position community, Pole Position, or the public (in case of a Law Enforcement Request);
- To comply with a legal requirement or process, including but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures.
- If you signed up for a promotion with another User's referral or promotion code, with your referrer to let them know about your redemption of or qualification for the promotion;
- With our insurance partners to help determine and provide relevant coverage in the event of an incident;
- To provide information about the use of the Pole Position Platform to potential business partners in aggregated or de-identified form that cannot reasonably be used to identify you; and
- Whenever you consent to the sharing.

## Your Choices

**Email Subscriptions.** You can always unsubscribe from our commercial or promotional emails but we will still send you transactional and relational emails about your account use of the Pole Position Platform.

**Push Notifications.** You can opt out of receiving push notifications through your device settings. Please note that opting out of receiving push notifications may impact your use of the Pole Position Platform (such as receiving a notification that your Booking has been approved).

**Profile Information.** While your name and uploaded photos will always be shared with Clubs, you may delete any additional information that you added to your Profile at any time if you do not want it shared with Clubs. If deleted, Clubs may request that information in order to complete or request Bookings. Dancers will always be able to see Clubs' names, location, and contact information.

**Location Information.** While you can prevent your device from sharing location information at any time through your Device's operating system settings, Dancer and Club location is core to the Pole Position Platform and without it we cannot provide our services to you. If you initially consent to our collection of location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. If you do so, certain features of our mobile applications will no longer function. You may also stop our collection of location information by following the standard uninstall process to remove our mobile application from your device.

**Facebook Friends.** You can control whether to enable or disable the Facebook mutual friends feature through your profile settings.

**Editing and Accessing Your Information.** You can review and edit certain account information by logging in to your account settings and profile. If you would like to terminate your Pole Position account, please contact us. If you choose to terminate your account, we will deactivate it for you but may retain information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain information from your account to collect any fees owed, resolve disputes, troubleshoot problems, analyze usage of the Pole Position Platform, assist with any investigations, prevent fraud, comply with our legal requirements, protect or defend our rights, enforce our contracts, enforce our Terms of Service, or take other actions as required or permitted by law.

## Other

**Data Security.** We are committed to protecting the data of the Pole Position community. Even though we take reasonable precautions to protect your data, no security measures can be 100% secure, and we cannot guarantee the security of your data. This includes, but is not limited to, the photos and other personal information provided to us by either a Dancer or Club.

**Children's Privacy.** Pole Position is not directed to children, and we do not knowingly collect personal information from individuals under 18. If we find out that a child under 18 has given us personal information, we will take steps to delete that information. If you believe that a child under the age of 18 has given us personal information, please contact us at our Help Center.

**Changes to Our Privacy Policy.** We may make changes to this Privacy Policy from time to time. If we make any material changes, we will let you know through the Pole Position Platform, by email, or other communication. We encourage you to read this Privacy Policy periodically to stay up-to-date about our privacy practices. As long as you use the Pole Position Platform, you are agreeing to this Privacy Policy and any updates we make to it.

**Contact Information.** Feel free to contact us at any time with any questions or comments about this Privacy Policy, your personal information, our use and sharing practices, or your consent choices by emailing us at [info@indywork.com](mailto:info@indywork.com) or by mail at

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