

Privacy Policy

Effective as of June, 2024

Welcome to Pivt's Privacy Policy!

Pivt respects your privacy and is committed to protecting your personal data. We want to be transparent with you about how we collect and use your information.

This "**Privacy Policy**" describes the privacy practices of MovingParts Inc. (doing business as 'Pivt') and our subsidiaries and affiliates (collectively, "**Pivt**", "**we**", "**us**", or "**our**"). This Privacy Policy describes how we collect, use, disclose and otherwise process personal information in connection with our websites, mobile apps and other services, and explains the rights and choices available to individuals with respect to their information. Our website and mobile apps are collectively referred to as the "**Sites**", and together with our other services, collectively referred to as the "**Services**".

This Privacy Policy is designed to describe the following:

- Personal Information We Collect
- Cookies and Similar Technologies
- How We Use Your Personal Information
- How We Share Your Personal Information
- Your Choices
- Security
- Children
- Sensitive Personal Information
- International Transfers of Data
- Other Sites and Services
- User Generated Content
- Changes to this Privacy Policy
- Contact Us
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Personal Information We Collect

Information you give us

Personal information that you may provide through the Services or otherwise communicate to us,, includes:

- **Contact information**, such as your first name, last name, and email address;
- **Social media profile information**, such as user ID, profile picture and networks to which you belong (e.g., school, workplace, hometown, moving with a family), and information about your interests and preferences;
- **Demographic details**, such as your age, language(s), country, and gender;
- **Personal information that may be contained in user generated content that you choose to submit to us**, as further described in the User Generated Content section;
- **Feedback and correspondence**, such as information you provide when you report a problem with the Services, receive customer support, or otherwise correspond with us;
- **Usage information**, such as information about how you use the Services and interact with us, including information associated with any content you upload to the Sites or otherwise submit to us through the Services, and information you provide when you use any interactive features of the Services; and
- **Precise geolocation information**, if you authorize our mobile application to access your location;

Information we collect from other users

We collect information that other users of the Services may provide about you. Users are able to interact with each other through the Services, and a user may provide personal information about another user through such interactions, including by recommending that other users interact through the Services.

Referrals

Existing users of our Services may have the opportunity to refer friends or other contacts to us. If you are an existing user, you may only submit a referral if you have permission to provide the referral's contact information to us.

Information automatically collected

When you access our Sites, we, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity on our Sites. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, unique device identifier, browser type, screen resolution, IP address, the website you visited before browsing to our Sites, general location information such as city, state or geographic area, and information about your use of and actions on our Sites such as pages you viewed, how long you spent on a page, navigation paths between pages, information about your activity on a page, access times, and length of access.

This information is collected using cookies and similar technologies. Please refer to the Cookies and Similar Technologies section for more details.

Third party platforms

If you choose to connect to the Services through any social media account or other third party platform, you may be able to use your settings in your account with that platform to limit the information that we receive from it. If you revoke our ability to access information from a third party platform in that way, that choice will not apply to information that we have already received from that third party.

Cookies and Similar Technologies

What are cookies?

'Cookies' are small data files stored locally on your computer or mobile device by a website. Our Sites may use both session cookies (which expire once you close your web browser or mobile application) and persistent cookies (which stay on your computer or mobile device until you delete them manually) to provide you with a more personal and interactive experience on our Sites.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third-party cookies, which are served by service providers or business partners on our Sites, and can be used by such service providers or business partners to recognize your computer or mobile device when it visits other websites.

Cookies we use

Our Sites use the following types of cookies for the purposes set out below:

Type of cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Sites and to enable you to use some of its features. Without these cookies, the services that you have asked for cannot be provided or will not function properly, and we only use these cookies to provide you with those services.
<i>Functionality Cookies</i>	These cookies allow our Sites to remember choices you make when you use our Sites (for example, your chosen language). The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-select your preferences every time you visit our Sites.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Sites and how users use our Sites. The information gathered may include the types of information described above in the section titled Information automatically collected. We use this information to help operate our Sites more efficiently, to gather broad demographic information, monitor the level of activity on our Sites, and improve the Sites.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing the browser plugin available here.</p>
<i>Social Media Cookies</i>	These cookies are used when you share information using a social media sharing functionality or use the 'like' (or similar) buttons on our Sites, or when you link your account or engage with our content on or through a social networking website such as Facebook or Twitter. The relevant social network will record

	that you have done this using their own cookies.
<i>Targeted and advertising cookies</i>	<p>These cookies track your browsing habits to enable us and third-party advertising networks to deliver ads that may be of interest to you. These cookies use information about your browsing history to group you with other users who have similar interests or browsing behaviors. Based on the cookies that the third-party advertising network sets on our Sites and other sites, advertisers can display advertisements that may be relevant to your interests on our Sites and while you are on third-party websites.</p> <p>You can choose to disable advertising cookies, as described below, or to opt out of the use of your browsing behavior for purposes of targeted advertising. Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking here or the Digital Advertising Alliance by clicking here. European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking here, selecting the user's country, and then clicking 'Choices' (or similarly-titled link). Mobile app users may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available here, and selecting the user's choices.</p> <p>Please note that if you choose to opt-out of targeted advertisements, you will still see advertisements on our Sites and elsewhere online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online targeted advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.</p>

Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the 'settings', 'help', 'tools' or 'edit' menus). **Many browsers are set to accept cookies until you change your settings.**

For further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

If you do not accept our essential or functional cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

Pixel tags

We may also use 'pixel tags' (also known as 'web beacons' and 'clear GIFs') on our Sites to track the actions of users on our Sites. Unlike cookies which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Sites, so that we can manage our content more effectively.

How We Use Your Personal Information

To operate and provide our Services

If you have a Pivt account or use our Services, we use your personal information to:

- operate, maintain, administer and improve the Services;
- enable you to login to the Services using third-party authentication providers;
- process and manage purchases and registrations you make through the Sites, including to administer contests and other promotions;
- manage individual referrals;
- better understand your needs and interests, and personalize your experience with the Sites;
- provide support and maintenance for the Services; and
- respond to your service-related requests, questions and feedback.

To communicate with you

We may need to communicate with you regarding your Pivt account, if you have one, including by sending you service

announcements, technical notices, updates, security alerts, and support and administrative messages.

In addition, if you request information from us (such as signing up for our newsletter), register on the Sites or participate in our contests or promotions, we may send you Pivt-related marketing communications as permitted by law. You will always have the ability to opt out of such communications.

To comply with law

We use your personal information as we believe necessary or appropriate to comply with our legal and regulatory obligations, such as to respond to subpoenas or requests from government authorities.

To create anonymous data for analytics

We may produce aggregated and/or anonymous data from your personal information and other individuals whose personal information we collect. Where we do so, we will ensure that any information that makes the data personally identifiable to you is removed (so that it no longer constitutes your personal data), and use that aggregated and/or anonymous data for our lawful business purposes.

We may also share such aggregated and/or anonymous data with our business partners, including relocation management agencies and employers. These third parties will not be able to identify you (or any other individual user) through the use of that data.

To display relevant marketing content to you

We use information collected from your device using cookies or similar technologies to display targeted advertisement to you on our Sites. Please refer to the [Cookies and Similar Technologies](#) section for more details on this, and to understand how to opt out of the use of certain cookies.

For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to: (a) enforce the terms and conditions that govern the Services; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Other uses of your personal information

We may use your personal information for reasons not described in this Privacy Policy where permitted by applicable law and where the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you by revising this Privacy Policy accordingly.

How We Share Your Personal Information

Affiliates

We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

Other users of the Services and visitors to the Sites

Content you submit to the Sites or through the Services may be viewable by other users of the Services. For example, other users may be able to see content you post through the Services such as your public profile, public posts, reviews and recommendations, and your name may be associated with that content. Please refer to the section on User Generated Content for additional details. If you participate in a Pivt contest or promotion, we may share contestant names as disclosed in the terms of the contest or promotion, including by posting the winner's name on our Sites.

Services providers

We employ third-party companies and individuals to administer and provide various aspects of the Services on our behalf (such as customer support, data hosting, email delivery and database management services). These third-parties may use your information only as directed by us and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Professional advisors

We may disclose your personal information to our professional advisors such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us. Our professional advisors are always subject to robust confidentiality obligations to protect your personal information.

Law enforcement and other public authorities

We may disclose information about you to government or law enforcement officials or private parties as required by law.

Business transfers

We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will use reasonable efforts to require the recipient to honor this Privacy Policy.

App data sharing

We will make commercially reasonable efforts to verify that the parties with whom our mobile application shares personal information provide a level of protection of personal information consistent with the practices described in this Privacy Policy, except that all such parties described above other than service providers and affiliates may, to the extent permitted by law, use personal information as described in their own privacy policies.

Your Choices

Access, Update, Correct or Delete Your Information

All Pivt account holders may review, update, correct or delete the personal information in their registration profile by logging into their account. You may also contact us at privacy@pivtapp.com to access, update or correct the personal information Pivt maintains about you, or if you have additional requests or questions.

Marketing communications

You may opt out of marketing-related emails by logging in and changing your account settings, by clicking on the 'Unsubscribe' link at the bottom of each such email, or by contacting us at privacy@Pivtapp.com. Please note that you may continue to receive service-related and other non-marketing emails from us.

Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (of you later ask us to delete it), we may not be able to provide you with all or part of the Services. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

Security

The security of your personal information is important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it. We also limit access to your personal information to those employees and other staff who have a business need to have such access, and all such people are subject to a contractual duty of confidentiality. However, no security safeguards are 100% secure and we cannot guarantee the security of your information.

We have put in place procedures to deal with any actual or suspected data breach. In the event of any such breach, we have systems in place to work with applicable regulators. In certain circumstances, we may notify you of breaches affecting your personal information.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any of our legal, accounting or reporting obligations.

To determine the appropriate retention period for your personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and whether we can achieve those purposes through other

means. We will never retain your personal information for longer than we are allowed under applicable law.

When we no longer require your personal information, we will either securely delete it or anonymize it (so that it can no longer be associated with you). Where we choose to anonymize your personal information, we may continue using it indefinitely in anonymized format without further notice to you.

Children

Our Sites are not intended for use by children under the age of 18 and we do not knowingly collect data relating to such children. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable upon request.

Sensitive Personal Information

We ask that you do not send or disclose any sensitive personal information (e.g. social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on the Sites, through the Services, or otherwise to us.

If you send or disclose any sensitive personal information when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.

International Transfers of Data

Pivt is headquartered in the United States and uses service providers located in other countries to deliver the Services, and your personal information may be transferred to the United States or other locations outside of your place of residence where privacy laws may not be as protective as those in your jurisdiction. Where that is the case, we will always do so in accordance with applicable data protection laws.

Users located in the United Kingdom or the European Economic Area should read the important information provided about international transfers of personal information in the section titled '[Additional Information for European Union Users](#)'.

Other Sites and Services

The Sites may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third-party. We do not exercise control over third-party websites or services, and are not responsible for their actions. Other websites and services may follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

User Generated Content

We may make available on our Sites, or link to, features that allow you to generate your own content or share information with other users of the Sites (e.g. message boards, chat functionalities, file uploads, etc.).

Please be aware that any information in such content will be visible to other users of the Sites. Do not embed personal information in the content you generate or share personal information online in public or community spaces. Whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others.

We have no control over, and take no responsibility for, the use, storage, dissemination or erasure of personal information embedded in user-generated content or shared publicly by you, except to the extent required by applicable law. By posting personal information online in public or community spaces, you may receive unsolicited messages from third parties.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Sites and in the app stores where our mobile application is available for download.

We may (and, where required by applicable law, will) also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have created a Pivt account) or another manner through the Services (which may include posting an announcement on or within the Sites).

Any modifications to this Privacy Policy will be effective upon our posting of the new terms (or as otherwise indicated at the time of posting). In all cases, your continued use of the Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

Contact Us

If you have any questions or concerns at all about our Privacy Policy or the way we handle your personal information, please feel email us at privacy@pivtapp.com. You can also use this email address to submit a question to our Data Protection Officer.

Our mailing address is: 4 Lexington Avenue, New York, NY 10010

Additional Information For UK and EEA Users

Personal information

References to “**personal information**” in this Privacy Policy are equivalent to the term ‘personal data’ as defined in European data protection legislation.

Controller

MovingParts Inc. (trading as ‘Pivt’) is the controller of your personal information in connection with the use of the Services for the purposes of European data protection legislation. See the [Contact Us](#) section above for contact details.

Legal bases for processing

We use your personal information only as permitted by law. European data protection legislation requires us to inform you of the legal bases we rely on to process your personal information, which are described in the table below.

Processing purpose (click link for details)	Legal bases
To operate and provide our Services	Contractual obligation – the processing of your personal information is necessary to perform the contract governing our provision of the Services to you or to take steps that you request prior to signing up for the Services.
To communicate with you	Legitimate interest – where we are sending you communications other than marketing communications, it is in our legitimate interest to communicate service updates to you. Consent – where we are sending you marketing communications, we rely on your consent to do so (which you provided when you signed up to our newsletters). You have the right to withdraw that consent at any time. Please refer to the section titled ‘Marketing communications’.
To display relevant marketing content to you	Consent – we rely on your consent to use certain cookies which allow us to display relevant marketing content to you on our Sites.
To comply with law	Compliance with law – the processing of your personal information is necessary to comply with our legal and regulatory obligations.
To create anonymous data for analytics	Legitimate interest – it is in our legitimate interest to understand the way our users use the Services and improve the Services accordingly.
For compliance, fraud prevention and safety	Compliance with law – the processing of your personal information is necessary to comply with our legal and regulatory obligations. Legitimate interest – it is in our legitimate interest to protect our Services against fraud.

Your rights

In addition to the rights set out in the section titled ‘Your choices’, European data protection legislation gives users located in the United Kingdom or the European Economic Area certain rights regarding their personal information. If that is the case, you may ask us to take the following actions in relation to your personal information that we hold:

- **Request access to your personal information.** This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal information.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to the processing of your personal information.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing on this ground.
- **Request the restriction of the processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information.** We will provide to you, or a third-party you have chosen, your personal information in a structured, commonly-used, machine-readable format.
- **Withdraw your consent.** This right only exists where we are relying on your consent to process your personal information. If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our Sites. We will advise you if this is the case at the time you withdraw your consent.

You can submit these requests by email to privacy@pivtapp.com or our postal address provided in the section titled 'Contact Us'. We may request specific information from you to help us confirm your identity and process your request. We will not charge you any fee for the exercise of your rights.

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In that case, we will notify you and keep you updated.

Applicable law may require or permit us to decline your request in certain circumstances. If we decline your request, we will tell you why, subject to legal restrictions.

Sending your information outside of the United Kingdom or European Economic Area

Whenever we transfer your personal information outside of the United Kingdom or European Economic Area, we will seek to ensure that a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal information to countries that have been deemed to provide an adequate level of protection by the European Commission. For further details, see European Commission: Adequacy of the protection of Personal Data in non-EU countries.
- We may use specific contracts approved by the European Commission, which give your personal information the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of Personal Data to third countries.
- In limited circumstances, we may seek your consent to the transfer of your personal information outside of the United Kingdom or European Economic Area.

You have the right to ask us to provide further details of such safeguards. If you wish to do so, please contact us using the contact details included in the section 'Contact Us'.

EU representative

As Pivt does not have an establishment in the European Economic Area, we have appointed a representative based in New York, NY who you may address to raise any issues or queries you may have relating to our processing of your personal information and/or this Privacy Policy more generally.

Our EU representative is: Lynn Greenberg. Our EU representative can be contacted directly by emailing them at the following address: lynn@pivtapp.com.