



# PRIVACY POLICY

Last modified: June 20, 2017 ([view archived versions](#))

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At Turn, we are committed to protecting the privacy of users of our mobile application, website and other services (we refer to all of these services as our “Services”). We’re also committed to providing you a rich, intensive experience when you use our Services and are always working to make them better. One of the ways we do that is by analyzing information we collect about you to figure out, for instance, what on-demand work you might be interested in. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it. We’ve done our best to keep the Privacy Policy short and simple, but please feel free to contact us if you have any questions about it.

## Information we collect

We collect information in the following ways:

- **Information you give us.** For example, our Services require you to create an account. When you do, we’ll ask for personal information, such as your name, email address, physical address and telephone number. We also ask you to create a profile, which may include your name and photo.
- **Information we get from your use of our Services.** We collect information about the Services that you use and how you use them. For example, when you click on an advertisement from one of our partners, we may provide you information about on-demand work opportunities for that partner and similar work opportunities with other partners. The information we collect includes:

- **Device information**

We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). We may associate your device identifiers or phone number with your Turn account.

- **Log information**

We may automatically collect and store certain information in server logs when you use our Services or view content we provide. This includes:

- details about your use of the Services.
- telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
- Internet protocol address.
- device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

- [“cookies”](#) that may uniquely identify your browser or your Turn account.
- **Location information**

We may collect and process information about your actual location when you use our Services. We use various technologies to determine location, including IP address, GPS, and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and cell towers.
- **Unique application numbers**

Some of our Services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Turn when you install or uninstall our application or when the application periodically contacts our servers, such as for automatic updates.
- **Local storage**

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage and application data caches.
- **Cookies and similar technologies**

We use various technologies to collect and store information when you visit our Services, and this may include using cookies or similar technologies to identify your device or browser.

Information we collect when you use our Services, in addition to information we obtain about you from our partners or other third parties, may be associated with your Turn account. We treat information associated with your Turn Account as personal information.

**Information we get from third parties.** We may supplement the personal information that we collect from you with outside records or other information collected or received from third parties. This may include social security numbers, billing addresses, payment card data, device data, financial history, criminal records, cellular carrier data, or other background information.

- **Carrier Consent**

You authorize your wireless carrier to disclose information about your account, such as subscriber status, payment method, and device details, if available, to support identity verification, fraud avoidance, and other uses in support of transactions for the duration of your business relationship with us. This information may also be shared with other companies to support your transactions with us and for identity verification and fraud avoidance purposes.

- **Social Networking**

Also, you may register with Turn directly or by logging into your account with a third-party social networking service (“SNS”) (e.g., Facebook, Google, and other third-party services that let you sign in using your existing credentials with those services). If you choose to register via an SNS, or to later link your Turn account to your account with an SNS, we will use the personal information you have provided to the SNS to create your account. Note that the information we collect from and through an SNS may depend on the privacy settings you have set with the SNS and the permissions you grant to us in connection with linking your Turn account to your SNS account. Other than what we may share with

the SNS as described below in the Social Networking Content section below, the personal information an SNS has about you is obtained by the SNS independent of our Services, and Turn is not responsible for it.

### **How we use information we collect**

- We use the information we collect from all of our Services to provide, maintain, protect and improve them, to develop new ones, and to protect you and Turn. We also use this information to offer you tailored content like relevant on-demand work opportunities.
- We may use the name you provide for your Turn account across all our Services that require an account. Also, we may replace past names associated with your Turn account so that you are represented consistently across all our Services.
- If you have a Turn account, we may display your profile name, profile photo, and actions you take on Turn or on third-party applications connected to your Turn account. We will respect the choices you make to limit sharing or visibility settings in your Turn account.
- When you contact Turn, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our Services, such as letting you know about upcoming changes or improvements.
- We use information collected from cookies and other technologies to improve your experience and the overall quality of our Services. For example, by saving your language preferences, we'll be able to have our Services appear in the language you prefer.
- We may combine personal information from one of our Services with information, including personal information, from our other Services.
- We'll ask for your consent before using information for a purpose other than those that are set forth in this Privacy Policy.

Turn processes personal information on servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

**UNLESS YOU REQUEST THAT WE DELETE CERTAIN INFORMATION (SEE THE TRANSPARENCY AND CHOICE SECTION BELOW), WE RETAIN THE INFORMATION WE COLLECT FOR AT LEAST FIVE (5) YEARS AND MAY RETAIN THE INFORMATION FOR AS LONG AS NEEDED FOR OUR BUSINESS AND LEGAL PURPOSES.**

### **Transparency and Choice**

People have different privacy concerns. Our goal is to be clear about what information we collect and how we use it so that you can make a meaningful choice about whether to give us that information. To that end, please don't provide us your personal information if you have any concerns about its privacy. However, you may not be able to use our Services in an effective manner without providing certain information.

If you delete certain personal information from your Turn account, then the account may become deactivated. If your account is deactivated or you ask to close your account, you will no longer be able to use our Services. Some information may actively persist in our systems even if you close your account. In addition, your personal information may remain in our archives and information you update or delete, or information within a closed account, may be preserved internally or for our administrative purposes. It is not always possible to completely remove or delete information from our databases. In addition, we typically will not remove any information you posted publicly through or using our Services.

## Accessing and Updating Your Personal Information

We aim to provide you with access to your personal information whenever you use our Services. You are responsible for maintaining the accuracy of the information you submit to us. But if that information is wrong, we strive to give you ways to update it quickly or to delete it, unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our Services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our Services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

## Information we share

We don't share personal information with companies, organizations and individuals outside of Turn except under these circumstances:

- **With your consent**

We will share personal information with companies, organizations or individuals outside of Turn when we have your consent to do so.

- **With partners**

We may share personal information with our partners that offer work opportunities through our Services to, for instance, determine your eligibility for work or to contact you to perform services for a company.

- **With third-party service providers**

We may share personal information with third parties that provide services to Turn including but not limited to marketing assistance, technical support, analytics, user screening, and risk management, provided that these third parties follow our instructions with respect to the information and they are in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

- **For external processing**

We may share personal information with our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Turn if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process or governmental request.

- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of Turn, our users or the Public as required or permitted by law.

We may share non-personal information publicly and with our partners or potential partners like publishers, advertisers, investors or connected websites. For example, we may share information publicly to show trends about the general use of our Services.

If Turn is involved in a merger, acquisition or asset sale, 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.

### **Information security**

We work hard to protect Turn and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. For example:

- We encrypt many of our Services using 256-bit SSL bank-level encryption.
- We offer you two step verification when you access your Turn account.
- We regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We regularly analyze our Services for possible vulnerabilities.
- We restrict access to personal information to Turn employees, partners, contractors and agents who need to know that information to process it for us or for other business reasons, and who are subject to contractual confidentiality obligations and may be reprimanded or terminated if they fail to meet these obligations.

### **When this Privacy Policy applies**

This Privacy Policy applies to all our Services, and, by using our Services, you agree to be bound by this Privacy Policy and consent to the use of your personal information as stated in this Privacy Policy. This Privacy Policy doesn't apply to services offered by other companies or individuals, including, for example, websites linked from our Services. Also, the Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, and other technologies to serve and offer relevant advertisements.

### **Compliance and Cooperation with Regulatory Authorities**

We regularly review our compliance with this Privacy Policy. When we receive formal written complaints, we will contact the user who made it to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

While this Privacy Policy states standards for maintenance of data, and while efforts will be made to meet these standards, Turn isn't in a position to guarantee compliance with these standards. In addition, no information security system is completely secure and there may be factors beyond our control that may result in disclosure

of data, such as a successful act of intrusion by a third party. Consequently, we offer no warranties or representations with regards to the maintenance or non-disclosure of data.

### **International Transfer of Personal Information**

Turn is a United States company. If you are located outside the U.S. and choose to provide information to us, we may transfer personal information to the U.S. for processing. The U.S. may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to the U.S., we will protect it as described in this Privacy Policy. By using our Services, or providing us with any personal information, you fully understand and consent to this transfer, processing and storage of your information in the U.S.

Turn protects personal information from residents of the European Union, other European Economic Area countries, and Switzerland in accordance with applicable law (including, as applicable, reliance upon your consent and EU-approved standard contract clauses).

### **Links to Other Sites**

Our Services may contain links to other websites. If you choose to click on a third party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We don't exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. We encourage you to read the privacy policies or statements of the other websites you visit.

### **Social Networking Content**

Our Services may interact with a third party website, service, or other content provider, such as enabling you to "like" or share content to a third party SNS. If you choose to "like" or share content, or to otherwise share information from or via our Services with a third-party site or service, that information may be publicly displayed, and the third party may have access to information about you and your use of our Services (and we may have access to information about you from them). These features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the feature to function properly. Your interactions with third parties through an SNS or similar features are governed by the respective privacy policies of those third parties.

You represent that you are entitled to use your SNS account for the purposes described herein without breach by you of any of the terms and conditions that govern the SNS, and without obligating Turn to pay any fees or making Turn subject to any usage limitations imposed by such SNS. Please note that your relationship with any SNS is governed solely by any agreement with such SNS. If your SNS account terminates, then functions that are enabled through the link between your Turn account and your SNS account may terminate as well.

### **Changes**

This Privacy Policy may change from time to time to address new issues, evolving technologies, changes in our Services, or other business practices. We will post any policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including email notification of privacy policy changes or in-application messages). We will also keep prior versions of this Privacy Policy in an archive for your review. Please close your account if you object to any changes in the Privacy Policy or you will be subject to them.

### **Contacting Us**

If you have any questions about this Privacy Policy, please contact us at [privacy@turning.io](mailto:privacy@turning.io) or by mail addressed to Turn Technologies, Inc., Attn: Privacy Policy Issues, 20 West Kinzie Street 17th Floor, Chicago, Illinois 60654.

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