



# legal notice

## PRIVACY POLICY

Last Updated: 07/15/2025

This Privacy Policy describes the privacy practices of NGL Labs LLC (“**NGL**”, “**we**”, “**us**”, or “**our**”) and how we collect, use and disclose the personal information about individuals who use our application, website (<https://ngl.link/>) and any other sites or services (collectively, the “**Services**”). For the purposes of this Privacy Policy, “**you**” and “**your**” means you as the user of the Services, whether you are an NGL Pro subscriber, website visitor, or another individual whose information we have collected pursuant to this Privacy Policy.

Please read this Privacy Policy carefully. By using any of the Services, you agree to the collection, use, storage, processing, disclosure and cross-border transfer of your information as described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use or access the Services.

NGL is the entity responsible for the processing of your personal information and is the data controller in respect of such processing. If you have any questions about this Privacy Policy or would like to exercise any of your rights, you can contact us at our contact details in Section 12 (Contact Us).

## 1. INTRODUCTION

NGL allows users to receive messages through their social media. This is how it works:

The NGL app permits a user (“**App User**”) to generate an NGL link and then use the link to solicit messages from anyone with access to the link (the person sending a message is a “**Message Sender**”).

When a Message Sender clicks on the NGL link, they will be taken to a URL where they can send a message directly to the App User. The App User also has the choice to post the messages and App User’s response to the App User’s social media accounts.

NGL does not store the name or social media handles of the Message Sender and cannot reveal this information to the App User or to others. NGL may reveal properties of the Message Sender or other NGL users to the App User. See “How We Disclose Your Personal Information” for more information.

To protect the safety of our users, we employ AI content moderation services like [Hive Moderation](#).

## 2. HOW WE PROCESS YOUR PERSONAL INFORMATION

We collect information about you from a variety of sources, and the type of information we collect depends on how you interact with our Services – such as whether you visit our website, download and use the NGL app, or send messages to App Users through the Services. This section provides more information on the types of information we collect from you and why. If required for your jurisdiction, it also identifies the legal basis under which we process your personal information.

You have the responsibility to ensure that any personal information which you provide to us is accurate and current. To confirm the accuracy of the personal information, we may also verify the information you provide to us. You hereby represent that you have obtained all necessary prior consent(s) before providing us with any other person’s personal information, so you remain responsible for any claims whatsoever from any party arising as a result of the absence of such consent(s).

Personal information	Purpose	Legal Basis
<b>Personal information you provide to us.</b> Some features of the Services may require you to directly provide us with certain information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features. Information that you directly submit through our Services includes the following:		
<b>Month and year of birth</b>	We use this information to determine your eligibility to use the NGL app.	Necessary to perform our contract with you to provide the Services.
<b>Account information</b> , such as the username that you provide when you download the NGL app and use the Services.	We use this information to allow you to: <ul style="list-style-type: none"><li>• create an account and use the Services.</li></ul>	Necessary to perform our contract with you to provide the Services.

<p><b>User-generated content</b>, such as photos uploaded to use as an NGL profile picture or messages that Message Senders submit to App Users through the Services.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• provide you with the Services; and</li> <li>• provide NGL Pro subscribers with information about Message Senders.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services.</p>
<p><b>Feedback or correspondence</b>, such as information you provide when you contact us with questions, feedback, product reviews, or otherwise correspond with us online.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• provide customer support and respond to your requests; and</li> <li>• better understand our users and improve the Services.</li> </ul>	<p>Necessary to perform our contract with you to provide and support the Services.</p> <p>It is in our legitimate interest to improve the Services.</p>

<b>Personal information we automatically collect.</b> We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications, and other online services.		
<b>Usage information</b> , such as information about how you use the Services and interact with us, including information associated with any content you upload to the Services or otherwise submit to us, and information you provide when you use any interactive features of the Services.	We use this information to: <ul style="list-style-type: none"> <li>• provide you with the Services;</li> <li>• troubleshoot, test and research and to keep the Services secure; and</li> <li>• personalize the Services.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services.</p> <p>It is in our legitimate interest to improve our Services.</p>
<b>Device data</b> , such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), unique identifiers (which may include identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 4G).	We use this information to: <ul style="list-style-type: none"> <li>• provide you with the Services;</li> <li>• troubleshoot, test and research and to keep the Services secure;</li> <li>• market the Services;</li> <li>• investigate and protect against fraudulent, harmful, unauthorized or illegal activity; and</li> <li>• provide NGL Pro subscribers with information about Message Senders.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services.</p> <p>It is in our legitimate interest to improve and keep our Services safe for our users.</p> <p>Consent (where required).</p>
<b>Location data such as IP address and approximate location information</b> such as city, state, or geographic area.	We use this information to: <ul style="list-style-type: none"> <li>• provide NGL Pro subscribers with information about Message Senders;</li> <li>• market the Services.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services.</p> <p>Consent (where required).</p>

<b>Online activity data</b> , such as pages or screens you viewed, how long you spent on a page or screen, browsing history, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.	We use this information to: <ul style="list-style-type: none"> <li>• provide customized Services and communications that may be relevant or of interest to you;</li> <li>• market the Services.</li> </ul>	It is in our legitimate interest to improve and customize our Services for our users.  Consent (where required).
<b>Information Collected From Other Sources.</b> We may obtain information about you from outside sources, including information that we collect directly from third parties.		
<b>Analytics data</b> we receive from marketing providers such as ad impressions, clicks, and app installs.	We use this information to market the Services.	It is in our legitimate interest to improve and better understand use of our Services.  Consent (where required).

In addition to the above purposes, we will use some, or all, of the above information to enforce our agreements, to comply with legal obligations and to defend us against legal claims or disputes. We may use your personal information in our legitimate business interests to enforce and comply with our terms and policies, to ensure the integrity of our Services and to defend ourselves against legal claims or disputes. Some processing may also be necessary to comply with a legal obligation, for example to keep records of transactions, or as requested by any judicial process or governmental agency.

**We also use the following “Tracking Technologies” for automatic data collection:**

**Cookies**, which are text files that websites store on a visitor’s device to uniquely identify the visitor’s browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.

**Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.

**Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

Please note that the information collected through Tracking Technologies may also constitute personal data. For more information on how we use Tracking Technologies and your choices, see the below Cookie Policy.

### 3. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your information to third parties for legitimate purposes subject to this Privacy Policy, including the following categories of third parties. Where we allow third parties to collect and use sensitive personal information, we will use reasonable measures to ensure that such third parties do not further disclose such information to the extent required by applicable laws.

- **NGL Pro subscribers.** We may disclose certain information about Message Senders and other NGL users with NGL users who have purchased an NGL Pro subscription. NGL may reveal to these subscribers properties of Message Senders and other NGL users based on information such as their IP address or browser user agent. This information includes interaction with the Services, such as messages sent, approximate location, device type, version, and carrier, or for NGL users, an NGL username.
- **Service providers.** We may disclose your personal information to third party companies and individuals that provide services on our behalf or help us operate our Services (such as customer support, content moderation, hosting, analytics, identity verification, fraud detection, payment processing, marketing providers, and database management).
- **Third parties in connection with a business transfer.** We may transfer 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 corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honor this Privacy Policy.
- **Third parties to ensure safety, security and compliance with the law.** We may also disclose your information as needed to comply with applicable law or any obligations thereunder or to cooperate with law enforcement, judicial orders and regulatory inquiries, to enforce any applicable terms of service or policies, for fraud prevention and safety purposes, and to defend ourselves against any legal claims or disputes.

### 4. HOW YOU DISCLOSE INFORMATION TO OTHERS

- **Other social media users:** You may choose to post the responses that you receive through the Services to your social media account. The settings of your social media account will determine which other individuals will be able to view these responses. Posting responses on your social media accounts may allow a third party to collect and/or use your information. We are not responsible for the privacy or security of, or information on, these social media platforms.

## **5. PRIVACY OF INDIVIDUALS UNDER 18**

Our Services are not intended for use by individuals under 18 years of age, and we do not seek or knowingly collect any personal information about individuals under 18 years of age.

If we learn that we have collected personal information through the Services from an individual under 18 without the consent of the individual's parent or guardian as required by law, we will delete it. If you are a parent or guardian of an individual under 18 years of age and you are aware that they have provided us with personal information, please contact us as set out in Section 12 (Contact Us). In certain cases, this age may be higher than 18 due to local regulatory requirements. Where the age of legal consent is higher than 18 years of age in your jurisdiction, you undertake that you have obtained your parent or legal guardian's consent to use the Services.

## **6. INTERNATIONAL DATA TRANSFERS**

Our servers are in the United States, so you will provide your data directly to us in the United States. We may transfer your personal information to our affiliates, service providers, and other third parties that support the Services in the United States.

Please note that such jurisdictions may not provide the same protections as the data protection laws in your home country. In these instances, we will ensure that relevant safeguards are in place to afford adequate protection for your personal information, and we will comply with applicable data protection laws, in particular by relying on adequacy decisions and assessments, on standard contractual clauses, or on your consent for the transfer of your personal information.

## **7. RETENTION OF PERSONAL INFORMATION**

We retain your personal information only for as long as is reasonably necessary to fulfill the purposes for which it was collected and processed, in accordance with our retention policies, and in accordance with applicable laws or until you withdraw your consent (where applicable).

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 use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **8. SECURITY PRACTICES**

We use reasonable organizational, technical, and administrative measures designed to protect against unauthorized access, misuse, loss, disclosure, alteration, and destruction of personal information. Unfortunately, data transmission over the Internet cannot be guaranteed as completely secure.

Therefore, while we strive to protect your personal information, we cannot guarantee the security of personal information.

## 9. OTHER SITES, MOBILE APPLICATIONS AND SERVICES

Our Services may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third-party websites, mobile applications or online services, and we are not responsible for their actions. We are not responsible for the privacy or security of, or information found on, these websites and services. Other websites and services follow different rules regarding the collection, use, and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

## 10. YOUR RIGHTS AND CHOICES

Depending on where you live, you may have some, or all, of the rights listed below in relation to information that we have collected about you. Please review these rights as they relate to you and your personal information. In certain circumstances, you may request the following in relation to your personal information:

- **Right to be informed** about how we have collected and used your personal information. You have a right to request that we disclose to you certain information regarding personal information, including details relating to the ways in which we use your personal information, or the ways in which your personal information has or may have been used or disclosed by us in the past.
- **Right to access** a copy of the personal information that we have collected about you. Where applicable, we will provide the information in a portable, machine-readable, readily usable format.
- **Right to correction** of personal information that is inaccurate or out of date.
- **Right to delete** personal information that we maintain about you.
- **Right to restrict processing to storage only**, whereby you may have a right to require that we stop processing personal information we hold about you, other than for storage purposes in certain circumstances. However, if we stop processing personal information, we may use it again if there are valid grounds under applicable data protection laws for us to do so.
- **Right to lodge a complaint** with the relevant supervisory authority.
- **Additional rights**, such as to **object** to our processing of your personal information, and where applicable, you may **withdraw your consent**



where the legal basis for processing is consent. However, where you withdraw your consent, we may not be able to deliver the expected service.

To make a request, please email us or write to us as provided in the “Contact Us” section below. California residents can empower an “authorized agent” to submit requests on their behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

**Limits on your choices.** In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in Section 12 (Contact Us).

## **11. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time, in which case we will notify you by updating the date of this Privacy Policy and posting it on our Services. If we make material changes to the way in which we use or disclose information we collect, we will provide notification of changes in another way that we believe is reasonably likely to reach you, or another manner through our Services where required by applicable laws. If you do not agree to any updates to this Privacy Notice, please do not continue using or accessing the Services.

## **12. CONTACT US**

If you have any questions or comments about this Privacy Policy, our privacy practices, or if you would like to exercise your rights with respect to your personal information, please contact us by email at [hello@niglapp.com](mailto:hello@niglapp.com) or write to us at 253 N. La Peer Dr., Beverly Hills, CA 90211.

## Supplemental Jurisdictional Terms

### California

This section applies to you only if you are a California resident (“**resident**” or “**residents**”). For purposes of this section, references to “personal information” shall include “sensitive personal information,” as these terms are defined under the California Consumer Privacy Act (“CCPA”).

#### *Processing of Personal Information*

In the preceding 12 months, we collected and (where indicated below) disclosed for a business purpose the following categories of personal information and sensitive personal information (denoted by \*) about residents:

<u>Category</u>	<u>Categories of Recipients</u>
Identifiers such as username	Service providers, including for cloud storage, and customer support  NGL Pro subscribers, these subscribers may receive the username selected by another NGL user
Commercial information such as records of products or services purchased	Service providers, including for cloud storage, and customer support
Internet or other similar network activity such as information regarding your interaction with the Services	Service providers, including for cloud storage, marketing services, and customer support  NGL Pro subscribers, these subscribers may receive information about Message Senders such as number of messages sent, when they sent a message, and device information
Geolocation data such as IP address and approximate location information such as city, state or geographic area	Service providers, including for cloud storage, marketing services, and customer support  NGL Pro subscribers, these subscribers may receive information about Message Senders' approximate location, such as city and state
Visual information such as your profile picture	Service providers, including for cloud storage and customer support

Account access credentials* such as username	Service providers, including for cloud storage and customer support
The contents of a resident's messages*, such as messages sent via the Services and communications with us	Service providers, including for cloud storage and customer support

The specific business or commercial purposes for which we collect your personal information and the categories of sources from which we collect your personal information are described in Section 2 (How We Process Your Personal Information). We only use and disclose sensitive personal information for the purposes specified in the CCPA. The criteria we use to determine how long to retain your personal information is described in Section 7 (Retention of Personal Information).

We disclosed personal information over the preceding 12 months for the following business or commercial purposes:

- to communicate with you, provide you with products and services, to market to you, etc.
- to maintain and secure your account with us
- to provide you with products or services you have requested
- to provide NGL Pro subscribers with the service they have requested

### ***Selling and/or Sharing of Personal Information***

**We do not “sell” or “share” (as those terms are defined under the CCPA) personal information, nor have we done so in the preceding 12 months.**

## COOKIE POLICY

Last Updated: 07/15/2025

This Cookie Policy explains how NGL ("we," "us," or "our") uses cookies and similar files or technologies when you visit our website (<https://ngl.link/>), application and any other sites or services (collectively, the "Services"). This policy should be read in conjunction with our Privacy Policy.

### What are cookies?

Cookies are small text files that are placed on your device (computer, smartphone, or tablet) when you visit a website. They are widely used to make websites work more efficiently, as well as to provide information to the owners of the site, such as providing details like approximate location in order for website hosts to determine analytics.

### How we use cookies

We use cookies for the following purposes:

- **Preferences cookies:** These cookies allow the Services to remember choices you make (such as your language preference or region) and provide enhanced, personalized features. These cookies may collect the information that you have inputted as a result of your preferences, but they are solely used to provide the requested functionality.
- **Performance cookies:** These cookies help us understand how users interact with the Services by collecting information about which pages are visited, how long users spend on each page, and what errors occur. This information is used to improve the performance and usability of the Services. These cookies collect aggregated, anonymous data to Framer and do not identify individual users.

### Your consent

Most browsers accept cookies automatically, but you may be able to control the way in which your devices permit the use of Tracking Technologies. You can withdraw your consent at any time by changing your browser settings or by using the cookie management tools provided by some third-party service providers. However, blocking or deleting cookies may cause some of the Services, including certain features and general functionality, to work incorrectly. If you have questions regarding the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information listed below.

To opt out of tracking by Google Analytics, click [here](#).

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. Like many websites, we currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>. To learn more about Global Privacy Control, you can visit <https://globalprivacycontrol.org/>.

### Changes to this policy

We may update this Cookie Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. If we make changes to the Cookie Policy, we will

notify you by updating the date of this Cookie Policy and posting it on our Services. If we make material changes to the way in which we use or disclose information we collect, we will provide notification of changes in another way that we believe is reasonably likely to reach you, or another manner through our Services, where required by applicable laws. If you do not agree to any updates to this Cookie Policy, please do not continue using or accessing the Services.

**Contact us**

If you have any questions about this Cookie Policy, please contact us at [hello@nglapp.com](mailto:hello@nglapp.com) or write to us at 253 N. La Peer Dr., Beverly Hills, CA 90211.