

# IMVU Privacy Notice

Last updated as of: December 10, 2021

Thank you for visiting IMVU's ("IMVU", "we", "us", "our") website located at [www.imvu.com](http://www.imvu.com) ("Site") and/or mobile application ("App"). Collectively, the Site and the App are referred to as the "Services" throughout this Privacy Notice. This Privacy Notice and our Cookie Notice cover our Site, our App, and any other websites, products, software, applications, data feeds, content or services on which an authorized link to this Privacy Notice and Cookie Notice are posted.

In order to provide the Services, we collect and process personal information. This Privacy Notice and our [Cookie Notice](#) govern how IMVU may collect, use, store and disclose personal information that we obtain through or in connection with the use of our Services.

We recommend that you read this Privacy Notice carefully as it provides important information about how we handle your personal information. It also tells you about your rights under the law.

You may print a copy of this Privacy Notice by clicking [\[here\]](#). If you have a disability, you may access this Privacy Notice in an alternative format by contacting us at [privacy@imvu.com](mailto:privacy@imvu.com).

**IF YOU ARE CALIFORNIA RESIDENT:** If you are a resident of California, this entire Privacy Notice applies to you. However, please see the section titled "[Additional Information for California Residents](#)" below, which will inform you in detail about our information collection practices and your specific rights.

**IF YOU ARE AN INDIVIDUAL LOCATED IN THE EEA OR THE U.K.:** If you are located in the European Economic Area ("EEA") or the United Kingdom ("U.K."), this entire Privacy Notice applies to you. However, please see the Section titled "[Additional Information for Individuals in the European Economic Area and the U.K.](#)" below, which will inform you in detail about our legal bases for processing and which rights you have in connection with our processing of your personal data.

**IF YOU ARE A RESIDENT OF NEVADA:** If you are a resident of Nevada, this entire Privacy Notice applies to you. However, please see the Section titled "[Notice for Nevada Consumers](#)" below, which will also apply to you.

If you have any questions or concerns regarding this Privacy Notice and/or our data practices, or if you would like to exercise your rights, do not hesitate to contact us at [privacy@imvu.com](mailto:privacy@imvu.com).

## Who We Are/Data Controller

If you use our Services, except as may be stated in this Privacy Notice, the data controller of your information is IMVU, LLC, a Delaware limited liability company with the following contact information:

IMVU, LLC  
P.O. Box 2772  
Redwood City, CA 94063-2052  
United States

## Changes to this Privacy Notice

IMVU may update this Privacy Notice from time to time, at our sole discretion. If we do so, we will post an updated Privacy Notice within the Services along with a change notice. Changes, modifications, additions, or deletions will be effective immediately upon their posting to the Services unless otherwise stated in the change notice. If we make material or significant changes, we may also send registered users a notice that this Privacy Notice has been

changed. We encourage you to review this Privacy Notice regularly for any changes. Your continued use of the Services and/or your continued provision of personal information to us after the posting of such notice will be deemed an acceptance of any changes and subject to the terms of the then-current Privacy Notice.

## Children's Privacy

**Our Services are not intended for children under the age of 13. IMVU does not target the Services to children under 13 and does not knowingly collect personal information from children under the age of 13.** If you are under the age of 13, please do not register to use the Services and do not give us any information about yourself.

If you are between the ages of 13 and 16 and reside in the EEA, we will obtain your or your parent's or guardian's verifiable consent to collect personal information, to the extent and as required by applicable law.

## What Personal Information Do We Collect and How Is It Collected?

Depending on who you are and why you are using our Services, we collect different types of information.

"Personal information" – or "personal data" as also used interchangeably throughout this Privacy Notice – means any information about an individual from which that person may be identified. For example, it may include your name, telephone number, email address, payment information, and your IP address, device ID, and location information. It does not include data from which the identity of an individual has been definitively removed, along with any identifiers connected to such individual, also referred to as deidentified or anonymized information.

When you visit or use our Services, we collect personal information directly from you when you provide it to us, as well as indirectly through automated technologies such as cookies.

Information Collected Directly

### *Account Registration Information*

To use the Services, we request that you provide your:

- Name
- Avatar or username
- Password
- Email address
- Age

In addition, we may collect any personal information that you elect to voluntarily include in your profile or when you use a certain feature such as the "Friend Matcher" feature, such as your gender, your relationship status, your sexual orientation, your self-selected country and why you are using the Services or the feature.

Note that, unless you have set your preferences to hide certain profile information, other users on our Services will be able to view your profile information and/or information you submit as part of your use of the "Friend Matcher" feature, as applicable. You expressly consent to our collection and processing of sensitive data, such as your sexual orientation.

### *Program Registration Information*

If you join our Creator Notification Program or certain other optional IMVU programs, we require additional information to ensure payment processing and we will also ask you for your:

- Real name
- Postal address
- Phone number
- Driver's license or other government-issued photo identification
- Tax ID number, and tax reporting forms

We will use this information to administer the Creator Notification Program or other programs for which you have registered, and may use this information to send you notices and information as may be required or necessary.

#### *Transaction Information*

If you wish to join our VIP program, add credits to your account, purchase rights to use a particular avatar name, earn free credits, or purchase VCOIN, or other virtual goods or services, we request certain personal information from you in order to verify your identity for fraud detection, for billing purposes, for compliance with applicable laws, and for filling your orders. You must provide us with your:

- Contact information, including name, email, and billing address
- Financial information, including credit card number, expiration date, PayPal account information, or a selfie (where applicable). If you use an identity-linked purchase tool (such as PayPal), we will retain an encrypted token of the purchase for our records
- Government-issued photo identification

Additionally, as explained below, we automatically collect and process information related to your purchases and orders for other internal business purposes, such as credits purchased or earned, the virtual goods you create, sell and/or purchase, the virtual price for such virtual goods, and the profit you make by selling such virtual goods. This is part of the Usage Information (defined below) that we collect.

#### *Email Communications*

When you sign up for the Services, you may choose to opt in to receiving IMVU marketing email. In addition, we may send you email updates from time to time. Examples include when someone adds you as a friend, when you get a new message from one of your friends, or when a user is not your friend but sends you a message. If you communicate with us via email, we will process the content of the communication in order to respond to your inquiry.

If you do not wish to receive certain types of email communications, you may click here [or set your preference under "Email"](#) in your Account Settings to change your options. You may not opt out of certain communications, such as those that update you about our terms or inform you of suspicious activity on your account.

#### *Uploaded Content Information*

You may upload photos and other content on the Services (for example, to use as your avatar image or for your Feed). We process this information if you choose to upload content to the Services. **Please be aware that, if you do this, any photos and other content that you post may be viewed by other users of the Services.** You may remove your photo(s), videos, and other content at any time by going to your account, selecting your content, and deleting content. Please note that you may not upload content about another individual unless you have their express permission to do so.

If you are a minor between the ages of 13 and 17, you may contact us via our [Help Center](#) to remove certain content that you have submitted on the Services.

### *Chat and Blog Information*

If you use the chat functionality, message board, or instant messages on the Services, you should be aware that any personal information you submit there can be read, collected, or used by IMVU and other users of these forums, and could be used to send you unsolicited messages. **We are not responsible for the personal or other information about you or anyone else that you choose to submit in these forums.**

We encourage you not to post any sensitive information when using the chat functionality or message board.

If you choose to subscribe to our Feed or Discussions by email, we will collect your email address, and we will use your email address to send you an email verification as well as email messages if people comment on the same photo or thread as you. You may unsubscribe to this at any time by following the instructions included in each email communication or by updating your subscription settings [here](#).

## Voice Data

If you use the functionality that enables you to speak with other users on the Services, we will use a tracking pixel, agent or other visitor identification technology that collects, uses, shares and stores data about you, including your voice. You should be aware that any personal information, including your voice itself, that you reveal in any discussions can be heard by other users of these forums with whom you interact. We encourage you not to reveal any sensitive information when using this functionality. We use this voice data for security purposes and to detect fraud and illegal activities. Our third party service provider of the voice functionality, Unity, may record your voice, and otherwise collect and use your personal information as set forth in the [Unity Privacy Policy](#).

### *Information Collected Indirectly*

#### Device and Usage Information

We, or authorized third parties, collect some personal information, including Device Information, Usage Information, as well as Location Data as described below, by automated means using cookies, web beacons, software developer kits (“SDK”) and server logs. For more information on our use of these technologies and the data that they collect, see the [Cookie Notice](#).

When you download, use, or interact with the Services, even if you do not have an account, we, or authorized third parties (such as service providers or, as explained [below](#), External Ad Partners), collect information about your use of the Services via your device. This information consists of:

- Information about your device (“Device Information”): information about the devices and software you use to access the Services – primarily the internet browser or mobile device that you use, the website or source that linked or referred you to the Services, your IP address or device ID (or other persistent identifier that uniquely identifies your computer or mobile device on the Internet), the operating system of your computer or mobile device, device screen size, and other similar technical information.
- Information about how you use the Services (“Usage Information”): information about your interactions with the Services, including access dates and times, hardware and software information, device event information, crash data, and cookie data. This information allows us to understand the screens that you view, how you have used the Services (which may include administrative and support communications with us or whether you have clicked on third party links), your interactions on the Services (including friend activity, blocked users, purchases and your preferences), and other actions on the Services. We, or our authorized third parties, automatically collect log data when you access and use the Services, even if you have not created an account or logged in. We use this information to administer and improve the Services, analyze trends, track users’ use of the Services, and gather broad demographic information for aggregate use.

- Information about your location (“Location Data”): we, or authorized third parties, collect your location data, including city, metro code, zip code, state, country, latitude and longitude, and area code through your IP address. To disable the collection of precise location information from your mobile device through the Services, you can access your mobile device settings and choose to limit that collection.

### *Information from Third Parties*

In some instances, we process personal information from third parties, which consists of:

- Data from our partners and service providers, such as Transaction Information from providers of payment services
- Data from our External Ad Partners (described [here](#) ).

## Why We Collect Your Personal Information and How We Use It

We, or our authorized partners, collect and process personal information in order to:

- Provide you the Services
- Ensure that our Services are operational and optimized for user experience, as well as enforce our Terms of Use with you if necessary
- Improve the content and general administration of the Services, including to detect harmful content or content that otherwise violates our policies
- Enhance user experience, including to provide you with customer support or to personalize your experience
- Detect fraud, illegal activities, or security breaches
- Enable you to participate in our Creator Notification Program or other programs
- Enable third parties to deliver advertising to you, and enable you to participate in promotions and surveys, for monetization purposes
- Provide you with notices regarding goods or services that you have purchased or may wish to purchase in the future including, in some cases, to send you direct marketing communications regarding IMVU’s products and services that we may think are of interest to you
- Respond to your queries and requests, or otherwise communicate directly with you
- Perform system maintenance and upgrades, and enable new features
- Conduct statistical analyses and analytics
- Understand how you access and use the Services in order to provide technical functionality, develop new products and services, and analyze your use of the Services, such as your interaction with applications, advertising, products, and services that are made available, linked to, or offered through the Services
- Provide information to regulatory bodies when legally required

**For California residents**, please visit this [Section](#) for more information on specific purposes of collection for each category of personal information collected in the past 12 months

**For individuals located in the EEA or the U.K.**, please visit this [Section](#) for more information on our legal bases for processing.

# Analytics

With the Device and Usage Information collected by us or our third party analytics services, such as Google Analytics, we generate and process “Aggregated Information”, which includes statistical or demographic data. Aggregated Information may be derived from personal data, but is not considered personal data under the law if it does not directly or indirectly reveal your identity. For example, we may track the total number of visitors to our Services or the number of visitors to each page of our Services, and we may aggregate usage data to calculate the percentage of users accessing a specific feature of the Services and analyze this data for trends and statistics.

However, if we combine or connect Aggregated Information with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be processed in accordance with this Privacy Notice.

For more information on our use of cookies and similar technologies for analytics purposes, please see our [Cookie Notice](#).

# Behavioral Advertising & Monetization

IMVU partners with third party advertisers, ad server companies, and ad networks (collectively, “External Ad Partners”) for advertising and monetization purposes, as well as marketing affiliates for specific offers (“Offerwall Providers”).

External Ad Partners, and in some cases Offerwall Providers, use cookies, beacons, tags, tracking pixels, and similar tracking technologies to collect certain Device Information and Usage Information, including IP address, device ID and Location Data described here. With this information and, in some cases, information about your visits to other websites and services, External Ad Partners provide advertisements on and off the Services about goods and services that are tailored to your interests. This is also referred to as “behavioral” or “targeted” advertising because External Ad Partners and Offerwall Partners track your activity on and off the Services in order to deliver targeted advertising based on your activity. In addition, the information that External Ad Partners and Offerwall Partners collect from our Services may be combined with other information from other sources and be used to build profiles on you and other individuals for the purposes of delivering targeted advertising.

If you elect to participate in the “Free Credits” or “Earn Credits” functionality and you opt in, note that relevant Offerwall Providers may also track performance and use data relating to the content as well as how you use the Services. For California residents, please click here for more information.

What does this mean? When you click on a link to an External Ad Partners on our Services, that External Ad Partner will drop a cookie (or similar tracking technologies) to capture and collect Device and Usage Information, so that it can track your activity on the Services, unless you are in the EEA or the U.K. and have not opted in or have blocked cookies as described below. This information may be combined with other information from other sources and be used to deliver targeted advertising.

For individuals in the EEA or the U.K.: you will be asked to opt-in to behavioral advertising and may withdraw your consent at any time by visiting here.

You can opt-out from some third party behavioral advertising at here.

Please note that even if you opt-out of behavioral advertising, you still may see other advertising when using the Services, but such advertising will not be based on your behavior.

It is important to understand that when External Ad Partners and/or Offerwall Providers collect your personal information through our Services, they may further disclose and share this information with many other companies within the online advertising ecosystem, with which neither IMVU, nor its users, has a direct relationship. While IMVU controls how it uses your personal information on its Services, these other companies within the online advertising

ecosystem may use your personal information to create a profile of you, or for other purposes as they determine and control.

For more information about interest-based advertising, please visit the Network Advertising Initiative website and/or the Digital Advertising Alliance (“DAA”) Self-Regulatory Program for Online Behavioral Advertising website. To learn more about interest-based advertising in mobile apps and to opt out of this type of advertising by third parties that participate in the DAA’s AppChoices tool, please use this link to download the version of AppChoices for your device. Please note that any opt-out choice you exercise through these programs will apply to interest-based advertising by the third parties you select, but will still allow the collection of data for other purposes, including research, analytics, and internal operations. You may also continue to receive advertising, but that advertising may be less relevant to your interests.

You may have more options depending on your mobile device and operating system. For example, most device operating systems (e.g., iOS for Apple phones, Android for Android devices) provide their own instructions on how to limit or prevent the delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems to learn more about these features and how they apply to tailored in-app advertisements.

Please visit our [Cookie Notice](#) for more information on the types of cookies that are used by us and our External Ad Partners within the Services, as well as information on your choices and how to opt out.

## Managing Your Preferences

### *Access and Correction of Your Personal Data*

*If and as permitted by applicable laws, you can request more information about the personal information we hold about you. If you believe that any personal information we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.*

### *Direct Marketing*

IMVU enables you to manage your marketing preferences by clicking on a link contained in each electronic communication to you. You can also use your preference settings to inform us of how you would like to receive marketing communications. Updates to your privacy preference information will be submitted once you have confirmed your changes.

You can also opt out of further direct marketing emails by clicking on the link at the end of each email message that you receive from us.

### *Precise Location Information*

To disable the collection of precise location information from your mobile device through the Services, you can access your mobile device settings and choose to limit that collection.

## Disclosure of Your Personal Information

We disclose your personal information under certain circumstances, such as to our service providers or in the event of a sale, as further described below.

### *Third Parties and Service Providers*

IMVU may share users’ information with our third party agents, contractors, or service providers who are hired to perform services on IMVU’s behalf to assist with certain business purposes. These providers may operate or support

certain functions of the Services. Below is a list of categories of service providers that we may use to perform these functions (subject to change):

- Analytics services
- Customer support services
- Surveys and promotions
- Billing services and payment gateway providers
- Hosting and content delivery network services
- Communication and content review tools
- Professional service providers, such as auditors, lawyers, consultants, accountants and insurers

Service providers process your personal information for the specific purpose of providing their services to us (and in accordance with our instructions).

As noted above, we also work with and disclose information to third parties, namely External Ad Partners and Offerwall Providers. Third parties may use your personal information for their own commercial purposes, to the extent you have not opted-in (in the EU) or opted-out.

#### *Business Transfers*

As we continue to grow, we may purchase websites, applications, subsidiaries, or other businesses or business units. Alternatively, we may sell businesses or business units, merge with other entities, obtain financing, and/or sell assets or stock, in some cases, as part of a reorganization or liquidation in bankruptcy. In order to evaluate and/or as part of these transactions, we may transfer your personal information to a successor entity upon a merger, consolidation, or other corporate reorganization in which IMVU participates, to investors and/or to a purchaser or acquirer of all or a portion of IMVU's assets, bankruptcy included.

#### *Public Forums and Community Areas*

We offer users the ability to use forums and similar means of public discussion. If you use any messaging, posting, voice, or chat functions on IMVU, you should be aware that any personal information submitted there will be available to anyone who has access to that content, including other users, and can be read, collected, or used by other users of these forums, and could be used to send unsolicited messages. We are not responsible for how other individuals use the information posted in this manner.

#### *Affiliates*

We may disclose your personal information to our corporate affiliates to assist us with our business operations.

#### *Anonymized Information*

We share anonymized, aggregated, automatically-collected, or otherwise non-personal information with third parties for various purposes, including (i) compliance with reporting obligations; (ii) business or marketing purposes; (iii) assistance for us and other parties in understanding our users' interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Services. We do not share personal information about you in this case.

#### *Legal Obligations and Security*

IMVU may preserve or disclose your personal information in limited circumstances (other than as set forth in this Privacy Notice), including: (i) with your consent; (ii) when we have a good faith belief it is required by law, such as pursuant to a valid subpoena, warrant, or other judicial or administrative order (as further explained below); (iii) to protect the safety of any person; (iv) to protect the safety or security of our Services or to prevent spam, abuse, or other malicious activity of actors with respect to the Services; or (v) to protect our rights or property or the rights or property of those who use the Services.



If we are required to disclose personal information by law, such as pursuant to a subpoena, warrant, or other judicial or administrative order, our policy is to respond to requests that are properly issued by law enforcement within the United States or via mutual legal assistance mechanism (such as a treaty). However, if we receive information that provides us with a good faith belief that there is an exigent emergency involving the danger of death or serious physical injury to a person, we may provide information to law enforcement trying to prevent or mitigate the danger (if we have it), which will be determined on a case-by-case basis.

Note: when interacting with other users, you are responsible for the personal information that you disclose and/or make public.

## Payment Processing

We use third party, PCI-compliant payment processors, which collect payment information on our behalf in order to complete transactions. While we receive payment confirmation when a user makes a purchase, we do not have access to, and are unable to process, your credit card information. We do, however, keep a record of completed transactions, as explained here.

### Social Media

IMVU maintains an online presence on social media platforms (“Social Media Platforms”) such as Instagram, Twitter or Facebook, to provide information about our Services and communicate with users and/or visitors to those pages or accounts. When you interact or post to our account, we process your personal information. In some cases, the Social Media Platforms are service providers or processors. In other cases, such as Facebook, we are jointly responsible for the processing, as explained in the section titled Facebook Products and Joint Controllership for Individuals in the EEA.

## Third-Party Sign-In

You may register to join or log in to the Services directly or by using a third-party platform sign-in such as Apple Sign-in or Facebook Login. If you choose to sign in to the Services through a third-party platform, the third-party platform may collect personal information about you and your activity, depending on how you have adjusted your privacy settings with that third-party platform. Your use of third-party sign-in for authentication purposes is subject to the privacy policies of those platforms. For individuals in the EEA, please review the section titled Facebook Products and Joint Controllership for Individuals in the EEA for information on our use of Facebook Products, including Facebook Login.

## Third Party Offers

If you wish to complete a third-party offer in order to earn free credits on the Services with an Offerwall Provider on the Site, you will be redirected to the Offerwall Provider’s website for the offer you wish to complete. In some cases, pages that you visit may have the look and feel of our Services (i.e., www.imvu.com). IMVU and our Offerwall Providers exchange your customer identification number, IP address and/or username once an offer has been completed so that we may match such information to your account in order to credit your account with the credits you have earned from the Offerwall Provider(s) for completing their offer(s). For information on how Offerwall Providers collect and use your information in exchange for credits, please refer to their respective privacy policies and their policies on addressing financial incentives for California residents.

## Do Not Track

IMVU does not track individuals across multiple platforms and does not respond to “Do Not Track” signals. To learn more, visit [www.allaboutdnt.com](http://www.allaboutdnt.com). However, certain third parties may collect information about your online activities over time and across different Internet websites or online services when you use our Services (such as via cookies).

## Protecting Your Personal Information

No method of transmission over the Internet (or method of electronic storage) is 100% secure, however we take steps that are reasonably necessary to securely provide our Services. We have put in place reasonably appropriate security measures designed to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. We limit access to personal data only to those employees, agents, contractors, and the third parties who have a business need-to-know.

We also have procedures in place to deal with any suspected data security breach. If required, we will notify you and any applicable regulator of a suspected data security breach. We also require those parties to whom we transfer your personal information to provide acceptable standards of security.

## International Transfers

The Services are hosted and operated in the United States (“U.S.”) through IMVU, its affiliates, and its service providers. Laws in the U.S. may differ from the laws where you reside and may be less protective than the laws of your country or region, such as the GDPR.

**By using the Services, you consent and acknowledge that any personal data about you, regardless of whether provided by you or obtained from a third party, is being provided to IMVU in the U.S. and will be hosted on the U.S. services by IMVU and/or its service providers, and you authorize IMVU and/or its service providers to transfer, store and process your information to and in the U.S. and possibly other countries.**

**Although by using our Services you automatically send your personal data to the U.S., which is not deemed an “adequate” jurisdiction by the European Union for data transfers, we adhere to the Standard Contractual Clauses and require parties to whom we disclose your information to adhere to the Standard Contractual Clauses to the extent not located in the EEA.**

## How To Contact Us About Privacy

If you have any questions regarding this Privacy Notice please contact IMVU by submitting a case here and selecting “Privacy and Safety” as a case category or via mail at:

Privacy Officer  
IMVU, LLC  
PO Box 2772  
Redwood City, CA 94063  
email: [privacy@imvu.com](mailto:privacy@imvu.com)

Additionally, for individuals located in the EEA or the U.K., please see the section below.

## Notice to Nevada Consumers

We do not sell your personal information within the scope of, and according to the defined meaning of a “sale” under, NRS 603A.

# Additional Information for Individuals in the EEA and the U.K.

## Categories of Recipients of Personal Data

The categories of recipients of Personal Data with whom we may share your personal data are listed in [Disclosure of Your Personal Information](#) above.

## Purpose of the Processing and Legal Bases

IMVU processes your personal information for a number of different purposes. Some are essential for us to provide the Services you use or to fulfill our legal obligations, some help us run the Services efficiently and effectively, and some enable us to provide you with more relevant and personalized offers and information. In all cases we must have a reason and a legal ground for processing your personal information. Some of the most common legal grounds we rely on are briefly explained below.

- **Performance of a Contract:** We may process your personal data for the purpose of performing under the terms of a contract to which you are a party - in other words, your ability to use the Services. For instance, if you purchase virtual items on the Services, we will process your data in order to carry out the payment transaction.
- **Legitimate Interests:** We may process personal data where it is necessary for our legitimate business interests, but only to the extent that they are not outweighed by your own interests or fundamental rights and freedoms. We generally rely on legitimate interests to provide and maintain Services that work well and securely, to carry out fraud prevention, and to generally improve the Services. When we rely on this legal basis, if required, we will carry out a legitimate interest assessment to ensure we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws.
- **Consent:** IMVU will rely on consent where it is required, such as when we are asking you to confirm your marketing preferences or when you submit sensitive data. When we rely on consent, you will be asked to confirm that you give your permission to IMVU to process your personal data. You have the right to withdraw your consent at any time if you no longer want to be part of the IMVU processing activity where your consent was sought.
- **Legal Obligation:** IMVU will on occasion be under a legal obligation to obtain and disclose your personal data or may cooperate in a legal or governmental investigation. Where possible, we will notify you when processing your data due to a legal obligation; however, this may not always be possible. IMVU may determine that it needs to provide your data in order to prevent criminal activity or help to detect criminal activity; in which case, we may share information with law enforcement without notifying you. It is essential that IMVU complies with its legal, regulatory, and contractual requirements, so if you object to this processing, IMVU will not be able to provide its Services to you.

The following breakdown illustrates in more detail how the above legal bases for processing apply to our primary purposes for processing different types of personal data. Please note that, with respect to legal bases, we only rely on one basis for each specific processing activity, but for purposes of this following breakdown, we may list more than one, which will then depend on the specific type of processing and circumstances. We have broken each processing activity by legal bases and categories of personal data processed:

- Provide you access to, and use of, the Services, including registering you for the Services and enabling purchases and orders [Legal Basis: Performance of a Contract] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Transaction Information, Email Communications, Information from Third Parties]

- Enable you to participate in our Creator Notification program or other programs [Legal Basis: Legitimate Interests or Consent, depending on the circumstances] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Email Communications, Uploaded Content Information, Chat and Blog Information, Voice Data, Transaction Information, Information from Third Parties]
- Ensure that our Services are operational and optimized for user experience, as well as to enforce our Terms of Use with you if necessary [Legal Basis: Legitimate Interests or Performance of a Contract, depending on the specific use] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Uploaded Content Information, Email Communications, Information from Third Parties, Voice Data, Chat and Blog Information, Transaction Information]
- Improve the content and general administration of the Services [Legal Basis: Legitimate Interests] [Personal Data: Account Registration Information, Program Registration Information, Voice Data, Chat and Blog Information, Device & Usage Information]
- Enhance user experience, including to provide you with customer support or to personalize your experience [Legal Basis: Legitimate Interests or Performance of a Contract, depending on the specific use] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Uploaded Content Information, Email Communications, Information from Third Parties, Transaction Information]
- Detect fraud, illegal activities, or security breaches [Legal Basis: Legitimate Interests] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Information from Third Parties, Transaction Information, Voice Data, and Chat and Blog Information]
- Enable third parties to deliver advertising to you, and to enable you to participate in promotions and surveys for monetization purposes [Legal Basis: Legitimate Interests or Consent, depending on the specific circumstances] [Personal Data: Account Registration Information, Device & Usage Information, Transaction Information]
- Provide you with notices regarding goods or services that you have purchased or may wish to purchase in the future [Legal Basis: Legitimate Interests, Consent, or Performance of a Contract, depending on the specific use] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Uploaded Content Information, Email Communications, Information from Third Parties, Transaction Information]
- Respond to your queries and requests, or otherwise communicate directly with you [Legal Basis: Legitimate Interests or Performance of a Contract, depending on the specific use] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Email Communications, Transaction Information]
- Perform system maintenance and upgrades, and enable new features [Legal Basis: Legitimate Interests] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information]
- Conduct statistical analyses and analytics [Legal Basis: Legitimate Interests or Consent, depending on the circumstances] [Personal Data: Device & Usage Information, Email Communications, Information from Third Parties, Transaction Information]
- Understand how you access and use the Services in order to provide technical functionality, to develop new products and services, and to analyze your use of the Services, such as your interaction with applications, advertising, products, and services that are made available, linked to, or offered through the Services including through the use of Social Media Platforms [Legal Basis: Legitimate Interests] [Personal Data: Account Registration Information, Program Registration Information, Device & Usage Information, Email Communications, Uploaded Content Information, Chat and Blog Information, Voice Data, Transaction Information, Information from Third Parties]
- Provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice [Legal Basis: Compliance with a Legal Obligations] [Personal Data: Only such information as may be required]

How Long Do We Keep Your Personal Data?

We use the following criteria to determine our retention periods: the amount, nature and sensitivity of your information, the reasons for which we collect and process your personal data, the length of time we have an ongoing relationship with you and provide you with access to our Services, and applicable legal requirements. We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax, or accounting requirements), when we are unable to reasonably verify your identity, or as may otherwise be required under GDPR. Additionally, we cannot delete information when it is needed for the establishment, exercise, or defense of legal claims (also known as a “litigation hold”). In this case, the information must be retained as long as needed for exercising respective potential legal claims.

When we have no ongoing business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible. If you have questions about, or need further information concerning, our data retention periods, please send an email at [privacy@imvu.com](mailto:privacy@imvu.com).

#### Staying in Control of Your Information: Your Rights

If you are in the EEA or the U.K., you have certain rights in relation to your personal data, including those set forth below. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, if an exception applies, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include personal data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the personal data we hold about you and request a copy of such personal data.
- **Rectification:** If you believe that any personal data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your personal data from our systems.
- **Withdrawal of Consent:** If we are processing your personal data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide consent on a case-by-case basis for the use or disclosure of certain of your personal data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your personal data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your personal data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request under those circumstances.

We will 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 this case, we will notify you and keep you updated as required by law.

In addition, if you no longer wish to receive our marketing/promotional information, we remind you that you may withdraw your consent to direct marketing at any time directly from the unsubscribe link included in each electronic marketing message we send to you. If you do so, we will promptly update our databases, and will take all reasonable steps to meet your request at the earliest possible opportunity, but we may continue to contact you to the extent necessary for the purposes of providing our Services.

Finally, you have the right to make a complaint at any time to the supervisory authority for data protection issues in your country of residence. A list of Supervisory Authorities is available here: <https://edpb.europa.eu/about-edpb/board/>

members\_en. We would, however, appreciate the chance to address your concerns before you approach the supervisory authority, so please contact us directly first.

Contacting our Representative in the EEA or the U.K.

- If you are in the EEA: IMVU has appointed the European Data Protection Office (EDPO) as its European Representative pursuant to Article 27 of the GDPR. You can contact EDPO regarding matters pertaining to the GDPR:
  - by using EDPO's online request form: <https://edpo.com/gdpr-data-request/>
  - by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium
  
- If you are in the U.K.: IMVU has appointed EDPO UK Ltd as its representative in the U.K. pursuant to the Data Protection Act 2018 ("U.K. GDPR"). You can contact EDPO UK regarding matters pertaining to the U.K. GDPR:
  - by using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>
  - by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

Facebook Products and Joint Controllership for Individuals in the EEA

Sometimes, IMVU acts as a 'joint controller' with certain third parties, namely certain social media sites, such as Facebook and Pangle. When IMVU and a partner act as joint controllers, you (as a data subject) may exercise your rights against IMVU and/or the third party. For a list of joint controller relationships, please contact us at [privacy@imvu.com](mailto:privacy@imvu.com).

We use Facebook's products and services ("Facebook Products") in different ways:

- You may login to the Services using Facebook Login
- To advertise our Services, as well as to communicate with interested parties or users, we also have a presence on Facebook (including Instagram)
- We use Facebook's social plugins as explained here

With respect to our use of Facebook Products, we are jointly responsible with Facebook Ireland for the processing activities ("Joint Processing"):

Facebook Ireland Ltd.,  
4 Grand Canal Square, Grand Canal Harbor  
Dublin 2, Ireland

Information about the personal data that is collected from you by Facebook, as well as how and why it is processed by Facebook, can be found at <https://www.facebook.com/about/privacy>.

IMVU and Facebook have entered into an agreement in order to determine the respective responsibilities for compliance with our obligations in connection with the Joint Processing within the meaning of the GDPR. This joint controller agreement, which sets out the reciprocal obligations, is available here.

IMVU's legal basis for processing your personal data via Facebook Products is our legitimate interest in increasing and analyzing the communication, sales, and promotion of Services. Our legal basis may also be your consent, which may be revoked at any time.

Please note that Facebook Ireland is responsible for enabling data subjects' rights under Articles 15-20 of the GDPR with regard to the personal data stored by Facebook Ireland in connection with the Joint Processing, as further described in Facebook's privacy policy. To exercise your rights, please go to your Facebook settings or contact Facebook as set forth in its privacy policy.

It cannot be excluded that some processing by Facebook Ireland Ltd. will also take place in the United States by Facebook Inc.

Regarding ads served by Pangle. Pangle is a joint controller of your Personal Data. Pangle's Technology enables the collection and transmission of Personal Data as set forth in Pangle's privacy policy located at <https://www.pangleglobal.com/privacy/enduser-en>. You can find out how to exercise your rights in relation to Pangle in the Pangle privacy policy.

## Additional Information for California Residents

This Privacy Notice for California Residents ("CCPA Notice") supplements the information contained in the Privacy Notice and applies solely to all visitors, users, and others who reside in the State of California ("Consumers"). We have created this CCPA Notice in order to comply with the California Consumer Privacy Act of 2018 ("CCPA").

Please note that this CCPA Notice does not apply to employees and job applicants.

### Categories of Information We Collect

IMVU's Services collect personal information as that term is defined in CCPA. Within the last twelve (12) months, IMVU has collected the following categories of personal information from or about Consumers (note that the lettered categories are according to lettering in the CCPA):

- A. Identifiers, such as a real name, unique personal identifier, online identifier, IP Address, email address, or account name
- B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)), such as a name, signature or telephone number
- C. Protected classification characteristics under California or federal law, such as age or gender
- D. Commercial information, such as records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- F. Internet or other similar network activity, such as browsing history or information on a Consumer's interaction with a website or application.
- G. Geolocation data, such as physical location.
- K. Inferences drawn from other personal information, such as profile information reflecting a person's preferences.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated Consumer information.
- Certain other information that is already regulated by other laws or regulations.
- Information that is specifically exempt from the scope of the CCPA.

### Categories of Sources of Personal Information

As explained in more detail [here](#), IMVU obtains the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, when you sign up to use the Services. This includes the following categories of personal information:
  - A. Identifiers
  - B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
  - C. Protected classification characteristics under California or federal law
  - D. Commercial information
  - G. Geolocation data
- **Indirectly.** For example, from observing your actions on our Services, including by the use of cookies or from third parties. This includes the following categories of personal information:
  - D. Commercial information
  - F. Internet or other similar network activity
  - G. Geolocation data
  - K. Inferences drawn from other personal information
- **By observing Consumers' behavior through their purchases and activity on the Site, Platform and Services.** This includes the following categories of personal information:
  - F. Internet or other similar network activity
  - G. Geolocation data
  - K. Inferences drawn from other personal information

## Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following business purposes:

- Provide you access to, and use of, the Services, including registering you for the Services and enabling purchases and orders: A. Identifiers; B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)); C. Protected classification characteristics under California or federal law; D. Commercial information; F. Internet or other similar network activity; G. Geolocation data; K. Inferences drawn from other personal information
- Enable you to participate in our Creator Notification program or other programs: A. Identifiers; B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)); C. Protected classification characteristics under California or federal law; D. Commercial information; F. Internet or other similar network activity; G. Geolocation data; K. Inferences drawn from other personal information
- Ensure that our Services are operational and optimized for user experience, as well as to enforce our terms of use with you if necessary: A. Identifiers; B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)); C. Protected classification characteristics under California or federal law; D. Commercial information; F. Internet or other similar network activity; G. Geolocation data
- Improve the content and general administration of the Services: D. Commercial information; F. Internet or other similar network activity; G. Geolocation data; K. Inferences drawn from other personal information
- Enhance user experience, including to provide you with customer support or to personalize your experience: A. Identifiers; B. Personal information categories listed in the California Customer



Records statute (Cal. Civ. Code § 1798.80(e)); D. Commercial information; F. Internet or other similar network activity

- Detect fraud, illegal activities, harmful content, or security breaches: A. Identifiers; B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)); C. Protected classification characteristics under California or federal law; D. Commercial information; F. Internet or other similar network activity
- Enable third parties to deliver advertising to you, and to enable you to participate in promotions and surveys, for monetization purposes: D. Commercial information; F. Internet or other similar network activity; K. Inferences drawn from other personal information
- Provide you with notices regarding goods or services that you have purchased or may wish to purchase in the future: A. Identifiers; D. Commercial information; F. Internet or other similar network activity; K. Inferences drawn from other personal information
- Perform system maintenance and upgrades, and enable new features: F. Internet or other similar network activity
- Conduct statistical analyses and analytics: D. Commercial information; F. Internet or other similar network activity
- Understand how you access and use the Services in order to provide technical functionality, develop new products and services, and analyze your use of the Services, such as your interaction with applications, advertising, products, and services that are made available, linked to, or offered through the Services (this includes through the use of Social Media Platforms): A. Identifiers; D. Commercial information; F. Internet or other similar network activity; K. Inferences drawn from other personal information
- Provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice: Any category of personal information as may be required and only as outlined in this Privacy Notice

#### Disclosure of Personal Information

IMVU may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the services for us. As explained in more detail [above](#), we also share your personal information with certain categories of third parties who assist us in providing our Services and with our business.

#### *Disclosures of Personal Information*

In the preceding 12 months, IMVU has disclosed the following categories of personal information for a business purpose:

- A. Identifiers
- B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- C. Protected classification characteristics under California or federal law
- D. Commercial information
- F. Internet or other similar network activity
- G. Geolocation data
- K. Inferences drawn from other personal information

We disclose your personal information for a business purpose to the following categories of service providers or third parties:

- Companies that do things to help us provide the Services: hosting service providers, user engagement and customer support providers, certain analytics providers, payment service providers, communication tools;
- Professional service providers, such as auditors, lawyers, consultants, accountants and insurers.

IMVU does not “sell” personal information as most people would typically understand that term. However, we do share personal information with or allow External Ad Partners to collect personal information about consumers through our Services to assist us with advertising. If you would like to opt-out of our sharing of your personal information with External Ad Partners for advertising purposes, please visit [www.imvu.com/next/policyhub/ccpa/](http://www.imvu.com/next/policyhub/ccpa/) or the section titled Advertising, Marketing & Monetization [above](#).

### *Your Rights and Choices*

The CCPA provides Consumers with specific rights regarding their personal information, provided that we are able to verify their identities as explained [here](#). This Section describes your CCPA rights and explains how to exercise those rights.

As explained above, if you would like to opt-out of us sharing your personal information with External Ad Partners for advertising purposes, please visit [www.imvu.com/next/policyhub/ccpa/](http://www.imvu.com/next/policyhub/ccpa/) or the section titled Advertising, Marketing & Monetization [above](#).

### *Access to Specific Information and Data Portability Rights*

You have the right to request that IMVU disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive your request **and verify your identity** (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will disclose such information to you.

### *Deletion Request Rights*

You have the right to request that IMVU delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive your request **and verify your identity** (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

- We may deny your deletion request if retaining the information is necessary for us or our service provider(s) for certain reasons as permitted and set forth in the CCPA.

### *Exercising Your Consumer Rights*

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable Consumer request related to your personal information. You may also make a verifiable Consumer request on behalf of your minor child.

An authorized agent is a natural person or a business entity registered with the Secretary of State that a Consumer has authorized to act on his or her behalf. When a Consumer uses an authorized agent to submit a request to know or a request to delete, IMVU may require that the Consumer provide the authorized agent written permission to do so and verify his or her own identity directly with IMVU, unless the Consumer has provided the authorized agent with a valid power of attorney. IMVU may deny a request from an agent that does not submit proof that he or she has been authorized by the Consumer to act on his or her behalf.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable Consumer request to us by either:

- 
- Logging into your IMVU account and navigating to [www.imvu.com/next/policyhub/ccpa/](http://www.imvu.com/next/policyhub/ccpa/); or
- emailing [privacy@imvu.com](mailto:privacy@imvu.com).

You may only make a verifiable Consumer request for access or data portability twice within a 12-month period. The verifiable Consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable Consumer request does not require you to create an account with us. Please note that the methods for verification are set forth in the CCPA, which also requires us to consider a number of factors, such as the type, sensitivity, and value of the personal information or the risk of harm posed by unauthorized access or deletion, on a case-by-case basis.

We will only use personal information provided in a verifiable Consumer request to verify the requestor's identity or authority to make the request.

#### *Response Timing*

We endeavor to respond to a verifiable Consumer request within the timeframes set forth in the CCPA.

Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable Consumer's request. If applicable, in our response, we will also explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable Consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### *Non-Discrimination and Notice of Financial Incentives*

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights. Please note that to use our Services, we do require the collection of your personal information - for example, to sign you up or to complete a paid transaction. While you may request to delete your personal information under CCPA, such deletions may affect IMVU's ability to offer the Services.

In addition, on our Services, our Offerwall Providers may offer you financial incentives, including, in some cases, in the form of IMVU credits, that are directly related to the value provided to the Offerwall Providers by the personal information for the collection, sale, retention, and use of your personal information as permitted by the CCPA. Please note that participating in incentive programs is entirely optional, you will have to affirmatively opt in to the program and you can opt out of each program by following the instructions in the applicable program description and terms as provided by the offer wall partner. The financial incentive programs and their terms are located on the offer wall or at the offer wall partner's site when you click on an offer to participate in an offer.

***Our Offerwall Providers determine what financial incentives and credits are provided to you, independent of IMVU, and as such are responsible for (a) determining the value of your personal information, (b) providing you with a proper notice of financial incentive under the CCPA, if applicable to them, as well as the ability to opt-in and subsequently opt-out, and (c) ensuring that they do not discriminate against you if you exercise your rights under the CCPA.***

We may add or change incentive programs and/or their terms by posting notices on the program descriptions and terms linked to the above so check them regularly.

#### *Other California Privacy Rights*

California residents may request information about our disclosures of certain categories of personal information to third parties for such third parties' direct marketing purposes. California residents may make such requests to us at [privacy@imvu.com](mailto:privacy@imvu.com). We will provide a list of the categories of personal information disclosed to such third parties for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the email specified in this section.

If you have any questions regarding this CCPA Notice, please contact IMVU by submitting a case here and selecting "Privacy and Safety" as a case category or via mail at:

Privacy Officer  
IMVU, LLC  
PO Box 2772  
Redwood City, CA 94063  
email: [privacy@imvu.com](mailto:privacy@imvu.com)

## IMVU Cookie Notice

Last updated as of: December 10, 2021

This Cookie Notice explains how we use cookies in connection with the Services, and your related choices.

Capitalized terms used in this Cookie Notice but not defined herein will have the meanings given to them in IMVU's Privacy Notice.

If you do not accept the use of these cookies, please disable them by following the instructions in this Cookie Notice - for instance, by clicking the Cookie Settings link (from our cookie banner and also available from the [button below](#) ) if you are located in the EEA or the U.K. or by changing your browser settings so that cookies on the Services cannot be placed on your computer or mobile device.

### What Are Cookies?

Like most websites, we use cookies and other standard Internet technologies to help us improve our Services. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. When you visit, access or use the Services, we may by means of cookies, beacons, tags, scripts, and/or similar technologies automatically collect technical information, including Device and Usage Information and other similar technical information.

A cookie can be classified by its lifespan and the domain to which it belongs. With respect to lifespan, a cookie is either a session cookie, which is erased when the user closes the browser, or a persistent cookie, which remains on

the user's computer/device for a pre-defined period of time. As to the domain to which a cookie belongs, it is either a first-party cookie, which is set by IMVU, or a third-party cookie stored by a different domain.

We use both session and persistent cookies, and enable first and third-party cookies. IMVU tracks users' use of the Services, but does not track users across third party websites.

## How and Why do We Use Cookies?

### *Strictly Necessary Cookies*

These cookies are necessary for the Services to function and cannot be switched off in our systems. They are usually only set in response to actions made by you, which amount to a request for access to our Services, such as setting your privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these cookies, but, if you do, some parts of the Services will not work.

These cookies include:

prefer\_alloy - Used to determine if you see IMVU Next or Core

alloy\_landing\_cookie - Used to determine if you see IMVU Next or Core

in\_ux - Assigned to a unique experiment

osCsid - Session cookie; required for login to function

Google Analytics - Used to determine site visitor demographics and improve services based on user demand

Threat Metrix - Required for fraud checking

### *Performance Cookies*

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Services. They help us to know which pages are the most and least popular and to see how visitors navigate the Services. Performance cookies are used to help us with our analytics, including to:

- Compile statistics and analytics about your use of, and interaction with the Services, including details about how and where our Services are accessed, how often you visit or use the Services, the date and time of your visits, your actions on the Services, and information regarding in-game activities, and other similar traffic, usage, and trend data (see [Device and Usage Information above](#)). These analytic tools allow us to better understand the functionality of our mobile software on your device and gain insights about how mobile software is used in order to improve your experience
- Gather important functionality, testing, and performance data about our Services, including performance data related to the Services, such as networking activity, CPU load, and resource usage, among other relevant data
- Moderate user behavior on the Services, such as protecting against payment fraud and other inappropriate activities.

We use third-party tools and technologies to help us gather this information. For instance, we use Google Analytics to collect and process certain analytics data with technologies such as tracking pixels.

These cookies include:

browser\_session - Tracks statistics about your IMVU session

window\_session - Tracks statistics about a specific IMVU window

imvu\_avnm - stores your avatarname for display purposes

saved\_locale - stores which language you prefer to see IMVU in

### *Targeting Cookies*

These cookies may be set on our Services by our External Ad Partners for advertising purposes. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites.

What does this mean? When you click on a link to an External Ad Partners on our Services, that External Partner will drop a cookie (or similar tracking technologies) to capture and collect Device and Usage Information, so that it can track your activity on the Services, unless you are a user in the EEA and have not opted in, or have blocked cookies as described in the Privacy Notice. This information may be combined with other information from other sources and be used to deliver targeted advertising.

These cookies include:

login\_interstitial\_seen - Tracks the last time you saw an interstitial, for aggregate analytics purposes

sncd - Tracks CIDs you have logged into, for detecting if a new account is an alt

nunu - Tracks if we believe you are a new new user

preLogID - Used to connect incoming users with their subsequent login or registration

imvua - Tracks which acquisition partner you came from

datetime\_entered - Tracks when you first landed on our site

linkshare\_site\_id - If acquired through a specific partner, tracks which ad you followed

lpip - Stores the IP you hit a landing page with

### *Your Choices*

Most web and mobile device browsers automatically accept cookies, but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. Some browser manufacturers provide comprehensive help relating to cookie management in their products. Please see your web browser provider's settings for more information.

You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org), which includes additional useful information on cookies and how to block cookies using different types of browsers or mobile devices.

Please note, however, that by blocking or deleting all cookies used on the Services, you may not be able to take full advantage of the Services and you may not be able to properly log on to the Services.

In addition, the following tools enable you to adjust specific settings:

To opt out from Google Analytics on the Site, you can download a plug-in by clicking [here](#), or visit Google's privacy notices to learn more about their practices and/or adjusting your settings.

If you are interested in learning more about and/or opting out of targeted advertising, we encourage you to visit one of the advertising industry-developed opt-out pages:

- NAI Opt-Out Page: <http://www.networkadvertising.org/choices>

- DAA Opt-Out Page: [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.youronlinechoices.com/>
- If you are located in the EEA, you may also opt-out of online behavioral advertising by visiting <https://www.edaa.eu/what-we-do/european-principles/>

Please note that, while we provide these links, we do not have access to, or control over, these third parties' use of cookies or other tracking technologies, other than as explained in this Privacy Notice. For California residents, please click [here](#) for more information.

If you do not wish to receive our personalized ads, please visit their opt out pages at the above links to learn about how you may opt out of receiving personalized ads from member companies.

### Changes to this Cookie Notice

IMVU may update this Cookie Notice from time to time, at our sole discretion. If so, we will post an updated Cookie Notice within the Services. Changes, modifications, additions, or deletions will be effective immediately upon their posting to the Services. We encourage you to review this Cookie Notice regularly for any changes. Your continued use of the Services and/or your continued provision of personal information to us after the posting of such notice will be deemed an acceptance of any changes and subject to the terms of the then-current Cookie Notice.