



CoffeeMeetsBagel

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INTRODUCTION

The following analysis compares the existing Privacy Policy for Coffee Meets Bagel (CMB) with the policy generated by Termsfeed, which are both located in the appendix as **Exhibits 1 & 2**. The analysis will compare each section and discuss what improvements can be made to the existing policy that CMB has on its website. This comparison was created based on the past six weeks of research into CMB's privacy concerns. Several different improvements will be discussed below.

Throughout the analysis, several themes will be discussed, including:

- Individual Control: giving consumers the freedom to choose
- Transparency: giving clear and apparent notice
- Respect for context: not using personal and private information in unpredicted ways
- Security: safeguarding user information from misuse and theft
- Access and accuracy: giving users the option to view and update their information
- Focused collection: not using more personal data than what is needed
- Accountability: incorporating these concepts in purposeful ways

POLICY DESCRIPTION

Both policies clearly state the last time each policy was updated, which is important to users as it shows that the policy is continually growing and that privacy concerns do matter to the brand. The Termsfeed generated policy does not mention the brand name in the opening description, which is important to add as it will support the overall branding of the policy.

One specific area that the current policy lacks is explicit consent to users. The current policy states, "by using our website, located at <http://www.coffeemeetsbagel.com> ("Website"), our mobile apps, and/or other services we provide (collectively, "Coffee Meets Bagel"), you agree to the practices set forth in this Privacy Policy". The way the updated policy states this part is more user-friendly: it reads, "by using the Service, you agree to the collection and use of information in accordance with this Privacy Policy." These policies need to be easy to understand and be as straightforward as possible when it comes to the copy. This is one of the many recommendations being presented.

One way to ensure consent and be transparent within the policy is to "[implement] checkbox consent on your [brand's] properties may help ensure your business's privacy policy is enforceable (Acheson Mallory & Chou, n.d.).

INTERPRETATION & DEFINITIONS

The following two sections are entirely missing from the existing policy. It is recommended that both new sections be added to the guidelines. These two sections of the policy help with overall accountability and transparency. By clearly calling out several definitions that will be seen throughout, it gives users the information they need to understand what they are getting involved with truly.

Interpretation: Several words are called out through the Termsfeed generated policy because they start with a capital letter. This is not seen in the existing policy, but it is needed. The new generated policy states, “the words of which the initial letter is capitalized have meanings defined under the following conditions.” It is important to note this ahead of time so users can understand why certain words are capitalized while others aren’t.

Definitions: In partnership with the above section, the definitions in the new policy define 14 separate terms, which are mentioned several times throughout the policy. These words are also defined in how they are used throughout the policy. Any mention of these words is capitalized. As for the current policy, there are no terms clearly defined or called out as users read through the policy. CMB first needs to confirm that all of these 14 terms will be used throughout their revised policy, and then it must be sure to call them out and define how they will be used.

COLLECTING & USING YOUR PERSONAL DATA

Personal Data: Coffee Meets Bagel’s current privacy policy does include a notation under their “information you choose to provide” section on personal identifiable information such as email address, zip code, birthday, gender, and gender preference, but it does not include first and last name. To improve compliance, this could be added to the current policy.

While the personal data spans the company’s mobile app services, the current policy could be more transparent about the differences in personal data collected between desktop and mobile devices based on the following criteria:

- “Mandatory for Certain Apps: Android apps that handle sensitive user data or require certain permissions must have a privacy policy. This is applicable both in the app and on the app’s listing.
- Clear Disclosure: The policy must clearly state what data the app collects, why it’s collected, and how it’s used. This includes sharing of data with third parties” (iubenda, n.d.).

Usage Data: Again, more transparency is recommended here. CMB could include more specific information about the data they collect from customers through their use of the service. In their current privacy policy, the section on “usage information” is vague. It includes the following but doesn’t explain further:

- How long and in what manner you use the service
- Which services and features used
- What content the consumer generates and their posts
- Browsing and search history

Information from Third-Party Social Media Services: The current privacy policy plan includes a reference to accessing third-party services, such as Facebook, but doesn’t include a listing of all third-party platforms that Coffee Meets Bagel interacts with. Including a list of platforms would align with the recommended version from TermsFeed.

In order to be compliant with the California Online Privacy Protection Act, a recommendation to provide more detailed usage data and third-party social media services information is advised below. “The Privacy Policy required by CalOPPA law must also have certain clauses, including:

- What types of personal information is collected and the third parties this collected personal information may be shared with
- How users can request changes to any of the personally identifiable information that was collected
- How the operator will notify users of changes/updates to the Privacy Policy
- The effective date of the Privacy Policy
- How the operator responds to the "Do Not Track" requests of users
- Whether other third parties may collect personally identifiable information about users through the operator's service” (Hamilton, 2024).

Tracking Technologies and Cookies: With more regulations on Cookies, CMB should provide forward-thinking, first-party data information to their consumers. For instance, how will they transition in terms of reaching their customers and managing consent and preferences in a “Cookie-less” world? “The end of third-party cookies on Chrome, along with the fact that Apple’s Safari browser and iOS no longer support tracking, effectively ends third-party data collection as we know it, marking a paradigm shift in how and where consent is captured—and who is in control” (TrustArc, n.d.).

USE OF YOUR PERSONAL DATA

Retention of Your Personal Data: CMB’s current privacy policy states that it retains the personal information it receives for as long as an individual uses its services or as necessary to...

- Fulfill the purpose(s) for which it was collected
- Provide its services
- Resolve disputes
- Establish legal defenses
- Conduct audits
- Pursue legitimate business purposes
- Enforce its agreements
- Comply with applicable laws

This may come across as vague to its users, as it is essentially stating that it retains personal data for an indefinite amount of time to conduct, establish, resolve, provide, and comply with the mentioned points above.

The original privacy policy also mentions using third-party identity verification practices to verify the user’s identity. It states that this biometric data will be destroyed within three years of satisfied identity verification. This may have users wondering why their biometric identification data is stored for up to 3 years before being erased from CMB’s system.

CMB’s current privacy policy regarding the retention of one’s personal data could be more concise in its statements and the actual length of time it holds on to a user’s personal data. For

instance, the generated privacy policy states that CMB will only retain personal data essentially only for as long as it would take to...

- Comply with its legal obligations
- Resolve disputes
- Enforce legal agreements
- Internal analysis purposes

The generated privacy policy also reinforces the fact that it does not hold on to a user's data for longer than it is legally required to. The generated privacy policy is succinct and provides a clearer understanding of the retention of users' personal data and reassurance that users' data will not linger in CMB's system for longer than it absolutely has to.

Transfer of Your Personal Data: CMB's current privacy policy states that a user located anywhere who is on the app may have personal data transferred, stored, and processed globally (including in the US, where CMB's servers are located, and its central database is operated). It also states that by using the app, the user understands and agrees to this taking place with their personal data. To clarify, this, amongst other information as well, is usually displayed in a long statement when creating an account, where the user must select "I Acknowledge" or "I Agree" to move forward in getting started on the app.

CMB's generated privacy policy conveys the same information. However, it includes a paragraph at the end stating that the company will take all necessary steps to ensure that user data is treated securely, and that no user data will be transferred unless adequate controls are in place to ensure security and confidentiality. This added paragraph at the end of the statement provides a sense of reassurance, security, and respect for context regarding the transfer of user data, which is lacking in CMB's current privacy policy.

Delete Your Personal Data: CMB's current privacy policy does state that a user can request to have account information edited or deleted through a request to the app itself. In the case of a deletion request, the app will deactivate and then permanently delete the given account within the app. Either way, a request from the user to the app must be submitted to follow through with either of these actions. With a request needing to be submitted, one can assume that there is an unspecified wait time for the request to be acted upon.

The generated privacy policy states that CMB may have to retain certain pieces of user information for legal reasons. However, it also states that the user has the right to edit or delete personal information themselves, or they have the option to make a request to have it done. It also states that these actions can be taken by the user signing into their account and visiting the account settings tab. The generated privacy policy provides a more user-friendly approach, bestows more individual control, and yields access and accuracy to users regarding their personal data, whether they want to edit or delete it.

DISCLOSING OF YOUR PERSONAL DATA

In the categories of privacy policies below, both the generated and the original Coffee Meets Bagel privacy policies have very different tones for consumers. The delivery of these important

privacy policy topics needs to 1) respect the consumer, 2) be clear and concise in its delivery, and 3) be careful not to offend or scare consumers about what happens to their personal data. As you read, you will quickly see that the generated policy comes off as very transparent and seems to get to the point in a caring and understanding way. The original version appears to be more direct and does not understand the consumer's feelings. It has no respect for context regarding co-consumers' personal data. This could lead to consumers not feeling respected and leaving little to no trust in the company.

Business Transactions: The generated privacy policy reads if the company is involved in a merger, acquisition, or asset sale, your personal data may be transferred. Notice will be provided before your personal data is transferred and becomes subject to a different privacy policy. If this company were to merge, partner, or be sold, consumers will be notified before the information is released, and consumers are subjected to a different privacy policy. This gives the consumer “respect for context” while being transparent.

The original Coffee Meets Bagel privacy policy lacks a clear section titled "Business Transactions." Instead, this aspect is grouped with "Law Enforcement/Legal Disclosures" and "Other Legal Requirements" under a single section, making it difficult for consumers to find pertinent information. The policy indicates that CMB may disclose personal information without consumer notice or consent in various circumstances such as mergers, financing due diligence, corporate restructuring, asset sales, or bankruptcy. While this approach may be transparent, it comes across as abrupt and could dissuade consumers from engaging with CMB due to the perceived lack of choice and individual control. The updated privacy policy explicitly states that consumers will be notified "before" any personal data is transferred, offering them advance notice in case of company sale or merger, thereby empowering consumers with information and choice.

Law Enforcement: The updated privacy policy outlines the company's stance on "Law Enforcement," indicating that under specific circumstances, it may need to disclose a consumer's personal data in compliance with legal obligations or in response to legitimate requests from public authorities, such as courts or government agencies. This clarification provides consumers with context, informing them that in situations involving law enforcement, CMB is obliged by law to disclose personal data if requested by a government agency or court. Emphasizing the importance of security, the policy underscores the mutual interest of both the business and the consumer in safeguarding personal information.

The original CMB privacy policy combines the "Law Enforcement" information with "Business Transactions" and "Other Legal Requirements," stating that personal data will be released regardless of if a legal request is made, such as a subpoena, court order, or government demand. Additionally, it mentions that your information may be disclosed without consent to investigate or report illegal activity, enforce CMB rights, or defend claims. The choice of wording is crucial in shaping how consumers perceive a company's privacy policy. However, this version lacks consideration for consumers' personal data or context. The aim is to provide essential information in a calm, non-confrontational manner by carefully selecting words and stating facts while instilling a sense of trustworthiness and protection in consumers.

Other Legal Requirements: Currently, there is no “Other Legal Requirements” section on the original CMB privacy policy page. The generated version provides this title and states that the company may disclose consumers' personal data in good faith, believing that such action is necessary, while demonstrating respect for context with consumers' data:

- Comply with a legal obligation
- Protect and defend the rights or property of the company
- Prevent or investigate possible wrongdoing in connection with the service
- Protect the personal safety of consumers of the service or the public
- Protect against legal liability

This communicates the facts while also informing consumers in a respectful and empathetic manner, prioritizing their feelings, and demonstrating consideration for context.

Security of Your Personal Data: The original Coffee Meets Bagel privacy policy reads in a manner that primarily concerns the business, leaving consumers using the app feeling overlooked and their personal data potentially exposed. The language used, including phrases like "Unfortunately," "we cannot ensure," and "we do not accept liability," focuses heavily on CMB's liabilities without adequately addressing consumer concerns. Moreover, the policy vaguely states that in the event of a security breach, CMB "may" attempt to notify users, leaving uncertainty and a lack of reassurance. This portion should present facts in a manner that instills confidence in consumers regarding the security of their personal data.

In contrast, the newly generated privacy policy employs positive language, emphasizing that "your personal data is important to us." While acknowledging that no method of online information sharing is entirely foolproof, the policy reassures consumers that diligent efforts will be made to safeguard their information. By promoting transparency, respecting context, and adhering to a "focused collection" approach, the policy aims to foster a sense of safety and security among users when providing personal data. This improved tone effectively delivers a sensitive message to consumers while acknowledging the inherent limitations of online security.

CHILDREN’S POLICY

The generated privacy policy mentions that the service does not address individuals under the age of 13 and that they do not knowingly collect personally identifiable information from anyone under this age. However, it lacks specificity regarding obtaining parental consent if required by the user's country. This aspect is crucial as various jurisdictions impose different requirements for collecting and processing the personal information of minors. “To comply with laws such as COPPA and new restrictions under certain state laws, companies must put age-verification mechanisms in place to ensure they do not collect information from minors under a certain age without parental consent. The age-appropriate design rules in the U.K. and California take a less prescriptive approach but require companies to estimate the age of users to a reasonable degree of certainty” (Denham et al., 2023). COPPA, the Children's Online Privacy Protection Act, is crucial for Coffee Meets Bagel (CMB) because it sets strict regulations regarding the collection and handling of personal information from children under the age of 13 (Federal Trade Commission, n.d.).

Coffee Meets Bagel's policy includes provisions for obtaining parental consent if necessary, and there's an explicit acknowledgment of the potential need for parental consent, ensuring that the platform adheres to legal requirements and best practices for handling children's data. This level of detail enhances transparency and builds trust with users and regulatory authorities, underscoring the company's commitment to safeguarding the privacy and security of all users, including minors.

CMB should include a dedicated section outlining the platform's approach to protecting children's privacy, age verification procedures, and parental control features to enhance current transparency and demonstrate a commitment to safeguarding minors' personal information.

LINKS TO OTHER WEBSITES

Both the generated privacy policy and Coffee Meets Bagel's current policy advise users to review the privacy policies of third-party sites and services when they click on links to those sites. However, the generated policy lacks the specificity seen in Coffee Meets Bagel's policy regarding assuming no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Coffee Meets Bagel's policy goes beyond a mere advisory by explicitly stating that the platform assumes no responsibility for third-party websites' content or practices. This proactive approach to disclaiming liability helps protect the platform from potential legal issues arising from users' interactions with external websites. By clearly delineating the scope of responsibility, Coffee Meets Bagel demonstrates a commitment to transparency and risk mitigation, fostering user confidence in the platform's integrity and accountability.

While CMB's current policy acknowledges the presence of links to other websites, it could provide more comprehensive guidance on users' interactions with third-party sites and their associated privacy policies. Enhancements could include explaining how users should exercise caution when navigating external links, clarifying that Coffee Meets Bagel is not responsible for the privacy practices of third-party sites, and advising users to review the privacy policies of linked websites for further information.

“No agency shall disclose any record which is contained in a system of records by any means of communication to any person, or another agency, except pursuant to a written request by, or with the prior written consent of, the individual to whom the record pertains [subject to 12 exceptions]” (Office of Privacy and Civil Liberties, 2022).

CHANGES TO THIS PRIVACY POLICY

Both policies mention that updates to the privacy policy will be communicated to users through email and/or a prominent notice on the service. They also mention updating the "Last updated" date at the top of the policy. However, the generated policy lacks the mention of notifying users prior to the change becoming effective, which is present in Coffee Meets Bagel's current policy.

Coffee Meets Bagel's policy goes a step further by explicitly stating that users will be notified before any changes to the privacy policy become effective. This proactive communication approach empowers users to stay informed about how their personal information is handled and provides them with an opportunity to review and consent to the updated terms. By prioritizing transparency and user consent in policy updates, Coffee Meets Bagel reinforces its commitment to respecting user privacy and fostering trust and accountability in its data processing practices.

CMB could enhance transparency by specifying how users will be notified of changes and providing a clear timeline for when updates will take effect. Improvements could involve incorporating details on the methods of notification (e.g., email notifications, in-app alerts) and emphasizing the importance of reviewing the updated policy to stay informed about any modifications to data handling practices.

CONTACT US

The contact information provided in both policies is similar, with email and physical mail options available. However, Coffee Meets Bagel's policy provides a specific email address for privacy-related inquiries, while the generated policy does not specify the purpose of the provided email address.

By including a dedicated email address for privacy-related inquiries, Coffee Meets Bagel demonstrates a proactive approach to addressing user concerns and inquiries regarding their personal information. This specialized contact information streamlines the process for users to reach out with privacy-related questions or issues, enhancing user experience and trust. Additionally, specifying the purpose of the provided email address clarifies its intended use, ensuring that inquiries related to privacy receive prompt and appropriate attention from the company's privacy team.

CMB could offer additional communication channels or dedicated support resources that could enhance accessibility and responsiveness. Considerations may include introducing alternative contact methods such as live chat support, expanding the scope of inquiries addressed, e.g., a dedicated privacy support team, and providing more detailed guidance on how users can escalate privacy-related issues if necessary. This will provide the users with more individual control over when and how they reach out to CMB regarding these issues.

CONCLUSION

The comparative analysis between Coffee Meets Bagel's (CMB) existing Privacy Policy and the policy generated by Termsfeed reveals several areas necessitating enhancement, including clearer consent mechanisms, transparent language, and comprehensive coverage of key aspects such as data retention, disclosure practices, and handling of children's data. By prioritizing user-friendly language and a tone that respects users' concerns, CMB can strengthen trust and compliance while aligning with best practices and legal standards. Implementing these recommendations not only enhances transparency and accountability but also fosters stronger relationships with users, demonstrating a genuine commitment to safeguarding their privacy rights amidst evolving regulatory landscapes and user expectations.

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APPENDIX

Exhibit 1: Termsfeed Generated Privacy Policy for Coffee Meets Bagel

Privacy Policy

Last updated: April 03, 2024

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. This Privacy Policy has been created with the help of the [Privacy Policy Generator](#).

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or parts of our Service.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Application refers to Coffee Meets Bagel, the software program provided by the Company.

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Coffee Meets Bagel, Inc., 391 Grove St, San Francisco, United States.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to: California, United States

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

Service refers to the Application or the Website or both.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company

to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

Third-party Social Media Service refers to any website or any social network website through which a User can log in or create an account to use the Service.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to Coffee Meets Bagel, accessible from <https://coffeemeetsbagel.com/>

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Information from Third-Party Social Media Services

The Company allows You to create an account and log in to use the Service through the following Third-party Social Media Services:

- Google
- Facebook
- Instagram
- Twitter
- LinkedIn

If You decide to register through or otherwise grant us access to a Third-Party Social Media Service, We may collect Personal data that is already associated with Your Third-Party Social Media Service's account, such as Your name, Your email address, Your activities or Your contact list associated with that account.

You may also have the option of sharing additional information with the Company through Your Third-Party Social Media Service's account. If You choose to provide such information and Personal Data, during registration or otherwise, You are giving the Company permission to use, share, and store it in a manner consistent with this Privacy Policy.

Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Information regarding your location
- Pictures and other information from your Device's camera and photo library

We use this information to provide features of Our Service, to improve and customize Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on Your device.

You can enable or disable access to this information at any time, through Your Device settings.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. You can learn more about cookies on [TermsFeed website](#) article.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

For more information about the cookies, we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

To provide and maintain our Service, including to monitor the usage of our Service.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

To provide You with news, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

To manage Your requests: To attend and manage Your requests to Us.

For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

By email: privacy@coffeemeetsbagel.com

By mail: Coffee Meets Bagel, Inc. PO Box 470490, San Francisco, CA 94147

Exhibit 2: Coffee Meets Bagel Current Privacy Policy

Last Updated: January 9, 2024

This privacy policy (“Privacy Policy”) describes the information collected by Coffee Meets Bagel, Inc. (“we,” “us,” or “our”), how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. By using our website, located at <http://www.coffeemeetsbagel.com> (“Website”), our mobile apps, and/or other services we provide (collectively, “Coffee Meets Bagel”), you agree to the practices set forth in this Privacy Policy.

Information we collect and how we collect it:

Information collected automatically:

When you use Coffee Meets Bagel, we automatically collect and store certain information about your computer or mobile device and your activities. We may use this, and other information described in this Privacy Policy to infer information, such as your interests. This information includes:

- *Mobile Device ID.* Your mobile device’s unique ID number (e.g., IMEI, AD ID).
- *Geolocation.* With your permission, your mobile device’s geographic location (GPS) when you first register for Coffee Meets Bagel through our mobile app or when you enable location services within the app.
- *Device Information/Specifications.* Technical information about your computer or mobile device (e.g., type of device, web browser or operating system, IP address) to analyze trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information.
- *Usage Information.* How long and in what manner you use Coffee Meets Bagel, which services and features you use and any content that you generate through and post on Coffee Meets Bagel. This includes browsing and search history (including profiles you have viewed). We link your subscriber information with your activity on Coffee Meets Bagel across all your devices using your email, phone number or similar information.
- *Cookies:* We and our service providers and business partners use “cookies” to keep track of some types of information while you are visiting Coffee Meets Bagel or using our services. “Cookies” are very small files placed on your computer, and they allow us to count the number of visitors to our Website and distinguish repeat visitors from new visitors. They also allow us and third parties we work with to save user preferences, track user trends, and advertise to you. We use both session and persistent cookies on our Website; session cookies expire at the end of a particular visit to our Website, while persistent cookies (also called stored cookies) remain active until you disable them through your browser settings, or until a pre-set expiration date. We rely on cookies for the proper operation of Coffee Meets Bagel; therefore if your browser is set to reject all cookies, Coffee Meets Bagel may not function properly. Without this information, we will not be able to provide you with all of the requested services, and any differences in services are related to your information.
- *Web Beacons:* “Web beacons” (also known as “clear gifs” and “pixel tags”) are small transparent graphic images that are often used in conjunction with cookies in order to

further personalize Coffee Meets Bagel for our users, collect a limited set of information about our visitors, and advertise to our users. We may also use web beacons in email communications in order to understand the behavior of our customers, such as whether an email has been opened or acted upon.

Information we obtain from other sources:

- *Facebook.* In order to register with certain Coffee Meets Bagel apps, you may be asked to sign in using your Facebook login. If you do so, you are authorizing us to access and process certain Facebook account information, including information about you and your Facebook friends who might be common Facebook friends with other Coffee Meets Bagel users. By allowing us to access your Facebook account, you understand that we may obtain and process certain information from your Facebook account, including your name, email address, birthday, work history, education history, current city, pictures stored on Facebook, and the names, profile pictures, relationship status, and information about your Facebook friends. We only obtain information from your Facebook account that you specifically authorize and grant us permission to obtain.
- *Third-Party Services:* We may receive the information described in this Privacy Policy from third party services, such as analytics providers and advertising partners.
- *Other users.* Users of Coffee Meets Bagel may provide us with information about you, including through customer support inquiries.

Information you choose to provide:

- *Information You Provide to Us.* When you register with certain Coffee Meets Bagel apps, you must provide certain information, including your username and password, email address, zip code, birthday, gender, and gender preference. We will also ask you to upload photos for your profile and may collect any information (including location metadata and inferred characterizations or data) contained in these files. You may provide additional information about yourself (such as your school, occupation, current city, etc.) in order to build your Coffee Meets Bagel profile. You may also provide “special categories of personal data” under applicable law, such as your race, ethnicity, religion, philosophical or political views, and information relating to your sex life or sexual orientation. By affirmatively providing Coffee Meets Bagel with this information, you explicitly consent to our use of it for the purpose of fine tuning your match criteria with other bagels. Any information that you provide in the non-personally identifiable section of your profile will be viewable by your match. When using Coffee Meets Bagel, you may also provide payment information (where required for the purpose of payment). We collect and process your messages with other users as part of the operation of Coffee Meets Bagel. If you use our video chat feature, you will need to provide the Coffee Meets Bagel app with access to your camera and microphone. We and others you video chat with may collect the content and information you make available using our video chat feature.
- *Referring Your Friends:* We encourage you to refer your friends to Coffee Meets Bagel by sending us your friends’ email addresses or phone numbers. We will keep this information in our database and enable you to send these friends a one-time email or text

message from your device containing your name and inviting them to visit our site. This email will also include instructions on how to opt out and unsubscribe from our email list. You agree that you will not abuse this feature by entering the email addresses or phone numbers of those individuals who would not be interested in Coffee Meets Bagel.

- *Emails*: We require an email address from you when you register with certain Coffee Meets Bagel apps. We use your email for both “administrative” (e.g., confirming your registration, notifying of matches) and “promotional” (e.g., newsletters, new product offerings, special discounts, event notifications, special third-party offers) purposes. Email messages we send you may contain code that enables our database to track your usage of the emails, including whether the email was opened and what links (if any) were clicked. You may opt-out of receiving promotional emails and other promotional communications from us at any time via the opt-out links provided in such communications, or by emailing privacy@coffeemeetsbagel.com with your specific request. However, we reserve the right to send you certain communications relating to Coffee Meets Bagel such as service announcements, security alerts, update notices, or other administrative messages) without affording you the opportunity to opt out of receiving such communications.
- *SMS Messages*: By providing your phone number to Coffee Meets Bagel, you consent to Coffee Meets Bagel sending you SMS messages with security codes.
- *Online Survey Data*: We may periodically conduct voluntary member surveys. We encourage our members to participate in such surveys because they provide us with important information regarding the improvement of Coffee Meets Bagel.
- *Photo Verification and Biometrics*: In certain circumstances, Coffee Meets Bagel may require you to verify your profile photo to prevent identity fraud and to improve Coffee Meets Bagel’s platform as a safe place to meet online. To do so, we provide your data to a third-party, Persona, an identity verification company, who may use your information in accordance with its privacy policy, which you can review at <https://withpersona.com/legal/privacy-policy>. During this process, Persona may collect, capture, use, and store scans of your facial geometry extracted from photos you upload during the verification process, and retain any photos of identity documents you upload, photos of your face that you upload, or scans of facial geometry or related biometric information extracted from the photos during the verification process. We require Persona to destroy such data when these purposes have been satisfied, within no more than 3 years of your last interaction with Persona, unless otherwise required by law or legal process to retain the data.

How we use the information:

Pursuant to the terms of this Privacy Policy, we may use the information we collect from you for the following business purposes:

1. facilitate matches with other Coffee Meets Bagel users;
2. respond to your comments and questions and provide customer service;
3. to tailor and provide communications to you about Coffee Meets Bagel and related offers, promotions, advertising, news, upcoming events, and other information we think will be of interest to you;
4. monitor and analyze trends, usage and activities;
5. investigate and prevent fraud and other illegal activities;
6. provide, maintain, and improve Coffee Meets Bagel and our overall business;

7. where we otherwise have a legitimate interest in doing so, for example, direct marketing, research (including marketing research), network and information security, fraud prevention, and enforcing our terms, conditions and policies or defending against legal claims; and
8. for any purposes disclosed to you at the time we collect your information or pursuant to your consent.

Use for Research. In addition to the uses outlined above, by using Coffee Meets Bagel, you agree to allow us to anonymously use the information from you and your experiences to continue our research into successful relationships, including how to create and foster these relationships, so that we may continue to improve the Coffee Meets Bagel experience. This research may be published in our blogs or interviews. However, all of your responses will be kept anonymous, and we assure you that no personal information will be published.

Sharing Your Information:

The information we collect is used to provide and improve the content and the quality of Coffee Meets Bagel, and without your consent we will not otherwise share your personal information to/with any other parties except: (a) to provide Coffee Meets Bagel, (b) when we have your permission, or (c) or under the following instances:

Other Users. We may share your profile information with other Coffee Meets Bagel users to facilitate matches in accordance with the functionality of our services. In addition, you may choose to share additional information with users of Coffee Meets Bagel once you have matched with them.

Service Providers and Business Partners. We may share your information with our third-party service providers and business partners that help us to accomplish certain business purposes (e.g., marketing and analytics providers, security and technology providers, advertising partners, and payment processors).

Legal Disclosures and Business Transfers. We may disclose any information without notice or consent from you: (a) in response to a legal request, such as a subpoena, court order, or government demand; (b) to investigate or report illegal activity; or (c) to enforce our rights or defend claims. We may also transfer your information to (a) any affiliate of our corporate group or (b) another company in connection with a merger, financing due diligence, corporate restructuring, sale of any or all of our assets, or in the event of bankruptcy.

Third-Party Services You Interact With. If you access third-party services, such as Facebook to login to Coffee Meets Bagel, these third-party services may be able to collect information about you, including information about your activity on Coffee Meets Bagel, and they may notify your connections on the third-party services about your use of Coffee Meets Bagel, in accordance with their privacy policies.

Aggregate Data. We may aggregate or de-identify the information described in this Privacy Policy. Aggregated or de-identified data is not subject to this Privacy Policy.

Unless otherwise stated in this Privacy Policy, Coffee Meets Bagel does not sell personal information to third parties. Coffee Meets Bagel does permit third parties to collect the personal information described above through our service and shares personal information with third

parties for business purposes as described in this Privacy Policy, including but not limited to providing advertising outside of our service based on users' online activities over time and across different sites, services, and devices (so-called "interest-based advertising"). The information practices of these third parties are not covered by this Policy.

Updating or Removing Account Information:

You may review or edit your profile as you wish, by logging into your Coffee Meets Bagel account using the information supplied during the registration process. If you would like to have us delete your account information, we may do so by deactivating your account first and then permanently deleting your account. Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your request for Coffee Meets Bagel services, or to respond to any inquiry or request made by you, as applicable. To opt out of receiving messages concerning Coffee Meets Bagel, you must cease requesting and/or utilizing services from Coffee Meets Bagel, and cease submitting inquiries to Coffee Meets Bagel, as applicable.

Your Privacy Rights

In accordance with applicable law, you may have the right to:

- Access Personal Information about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; or (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (aka the right of data portability);
- Request Correction of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- Request Deletion of your personal information;
- Request Restriction of or Object to our processing of your personal information; and
- Withdraw Your Consent to our processing of your personal information.

If you would like to exercise any of these rights, please contact us as set forth below. We will process such requests in accordance with applicable laws.

Third Party Sites

Coffee Meets Bagel may contain links to other websites and services. If you choose to click on a third party link, you will be directed to that third party's website or service. The fact that we link to a website or service is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites or services. These third parties may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites and services you visit.

Data Retention

Coffee Meets Bagel retains the personal information we receive as described in this Privacy Policy for as long as you use our services or as necessary to fulfill the purpose(s) for which it was collected, provide our services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws. As outlined above, Coffee Meets Bagel works with a third-party identity verification company, Persona, to use biometric identifiers and associated information for photo verification. Biometric data will be destroyed when the verification purposes have been satisfied, within no more than 3 years of your last interaction with Persona, unless otherwise required by law or legal process to retain the data.

Securing Your Personal Information

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure. By providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of Coffee Meets Bagel. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an email to you. You may have a legal right to receive this notice in writing.

Your Choices

Cookies. You may be able to refuse or disable cookies by adjusting your browser settings. Because each browser is different, please consult the instructions provided by your browser. If you choose to refuse, disable, or delete cookies, some of the functionality of Coffee Meets Bagel may no longer be available to you. Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information. You can manage third-party advertising preferences for some of the third parties we work with to serve advertising across the Internet by clicking here and by utilizing the choices available at http://www.networkadvertising.org/managing/opt_out.asp and www.aboutads.info/choices.
SMS Messages. You may opt out of receiving SMS messages from us by following the instructions in the SMS message or by otherwise contacting us.

Mobile Devices. We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. Your mobile device may include a feature that allows you to opt out of some types of targeted advertising ("Limit Ad Tracking" on iOS and "Opt out of Interest-Based Ads" on Android). You can switch off GPS location information functionality on your mobile device if you do not wish to share GPS information.

"Do Not Track." Some browsers transmit "do-not-track" signals to websites. Because of differences in how browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

Supplemental Notice for California Residents

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information Coffee Meets Bagel has collected about them and whether Coffee Meets Bagel disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

Sensory data

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above.

Additional Privacy Rights for California Residents:

“Sales” of Personal Information under the CCPA. For purposes of the CCPA, Coffee Meets Bagel does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

Nondiscrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth below.

Verification. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth below. We will process such requests in accordance with applicable laws.

“Shine the Light” requests. You have the right to request and obtain from us once a year at no charge a list of all third parties, if any, to which we have disclosed your personal information during the preceding calendar year for those third parties’ direct marketing purposes. If you would like such a list, please contact us at privacy@coffeemeetsbagel.com. For all such requests, you must put the statement “Shine the Light Request” on your request, as well as your name, street address, city, state, and zip code. Please note that we will not accept these requests by telephone or fax and are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Using Coffee Meets Bagel from outside the United States:

If you are visiting Coffee Meets Bagel from outside the United States, please be aware that your information may be transferred to, stored, and processed globally, including in the United States where our servers are located, and our central database is operated. By using our services, you

understand and agree that your information may be transferred to our facilities and those third parties with whom we share it for processing as described in this Privacy Policy. Where required by law, international transfers of personal information will be supported by an adequacy mechanism.

Changes to this Privacy Policy:

We may update this Privacy Policy from time to time. If there are any material changes to this Privacy Policy, Coffee Meets Bagel will notify you by email or as otherwise required by applicable law. When we post changes to this Privacy Policy, we will revise the “last updated” date at the top of this Privacy Policy. We recommend that you check our Website from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

How to Contact Us:

If you have any questions about our privacy practices, this Privacy Policy, or how to lodge a complaint with the appropriate authority, please contact us by email at privacy@coffeemeetsbagel.com or by mail at Coffee Meets Bagel, Inc. PO Box 470490, San Francisco, CA 94147.