Privacy Policy

Last updated November 1, 2026

This Privacy Notice for Swift Holdings LLC (doing business as The Swift Club) ("we," "us," or "our") describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("Services"), including when you:

- Download and use our mobile application (The Swift Club), or any other application of ours that links to this Privacy Notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@theswiftclub.com.

Summary of Key Points

This summary provides key points from our Privacy Notice. You can find more detail on each topic in the sections referenced below.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more in Section 1.

Do we process any sensitive personal information? Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law. Learn more in Section 1.

Do we collect any information from third parties? We receive limited information from Apple, such as your subscription status, and from our advertising measurement partners, such as which ad led to your install. Learn more in Section 3.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, keep our community safe, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more in Section 2.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties, including our service providers and advertising measurement partners. Learn more in Section 3.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more in Section 6.

What are your rights? Depending on where you are located, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more in Section 8.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us at info@theswiftclub.com. We will consider and act upon any request in accordance with applicable data protection laws.

Table of Contents

1. What Information Do We Collect?
1. How Do We Process Your Information?
2. When and With Whom Do We Share Your Personal Information?
3. Do We Use Cookies and Other Tracking Technologies?
4. How Long Do We Keep Your Information?
5. How Do We Keep Your Information Safe?
6. Do We Collect Information From Minors?
7. What Are Your Privacy Rights?
8. Controls for Do-Not-Track Features
9. Do United States Residents Have Specific Privacy Rights?
10. Do We Make Updates to This Notice?
11. How Can You Contact Us About This Notice?
12. How Can You Review, Update, or Delete the Data We Collect From You?

1. What Information Do We Collect?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you apply to or register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- date of birth and age
- gender
- height
- profile photos and videos
- job title
- education
- city and location
- languages spoken
- application and profile answers
- messages and other content you send through the Services
- selfie verification image (see "Selfie Verification" in Section 10)
- purchase and subscription history (payment card details are handled by Apple and are never seen by us)

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- data about a person's sex life or sexual orientation
- information revealing race or ethnic origin
- information revealing religious or philosophical beliefs

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- **Geolocation Information.** We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model, Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.

- **Push Notifications.** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information, such as your Internet Protocol (IP) address and/or browser and device characteristics, is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, to measure the performance of our advertising, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies, software development kits (SDKs), and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

- **Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

2. How Do We Process Your Information?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, keep our community safe, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can apply, create and log in to your account, as well as keep your account in working order.

- **To review membership applications.** We may process your information to evaluate your application and decide whether to offer you membership.

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.

- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.

- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.

- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.

- **To keep our community safe.** We review applications, profiles, photos, and reported content, both manually and with automated tools, to detect and remove content and accounts that violate our Terms. When a user is reported, we may review relevant messages to investigate.

- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.

- **To evaluate and improve our Services, products, marketing, and your experience.** We may process your information when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.

- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.

- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to measure which ads lead to installs, registrations, and purchases, and to better understand how to provide marketing and promotional campaigns that are most relevant to you.

- **To comply with our legal obligations.** We may process your information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.

3. When and With Whom Do We Share Your Personal Information?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Service Providers.** We use vendors to operate the Services, under contracts that limit how they may use your information: Amazon Web Services (hosting, storage, and automated content moderation), Google Firebase (app infrastructure), Google Analytics and Mixpanel (usage analytics), and Apple (payments and subscriptions).

- **Advertising Measurement.** We use AppsFlyer and Meta, including their software development kits in our app, to measure how our ads perform. When you install or use the app, these partners may receive device identifiers, IP address, and in-app events such as registration, verification, or purchase. If you allow tracking through Apple's App Tracking Transparency prompt, this may include your device's advertising identifier. Where possible, we use Apple's privacy-preserving ad attribution, which does not identify you.

- **Business Transfers.** We may share or transfer your 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.

- **When we use Google Maps Platform APIs.** We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Places API). We use certain Google Maps Platform APIs to retrieve certain information when you make location-specific requests. This includes geolocation and other similar information. A full list of what we use information for can be found in this section and in Section 2. Google Maps uses GPS, Wi-Fi, and cell towers to estimate your location. We obtain and store on your device ("cache") your location. You may revoke your consent anytime by contacting us at the contact details provided at the end of this document. The Google Maps Platform APIs that we use store and access cookies and other information on your devices.

- **Other Users.** When you share personal information (for example, by posting comments, contributions, or other content to the Services) or otherwise interact with public areas of the Services, such personal information may be viewed by other users. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.

- **Prospective Members.** Approved members' profile photos and basic profile information may be shown to prospective members during the application process.

4. Do We Use Cookies and Other Tracking Technologies?

In Short: We may use cookies, SDKs, and other tracking technologies to collect and store your information.

We may use cookies, SDKs, and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic functions.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and to measure the performance of our advertising, as described in Section 3.

To the extent these online tracking technologies are deemed to be a "sale" or "sharing" (which includes targeted advertising, as defined under the applicable laws) under applicable US state laws, you can opt out of these online tracking technologies by submitting a request as described in Section 10.

Google Analytics. We may share your information with Google Analytics to track and analyze the use of the Services. To opt out of being tracked by Google Analytics across the Services, visit https://tools.google.com/dlpage/gaoptout. For more information on the privacy practices of Google, please visit the Google Privacy & Terms page.

5. How Long Do We Keep Your Information?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. How Do We Keep Your Information Safe?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best

to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. Do We Collect Information From Minors?

In Short: We do not knowingly collect data from or market to anyone under 18 years of age.

We do not knowingly collect data from or market to anyone under 18 years of age, nor do we knowingly sell or share such personal information. By using the Services, you represent that you are at least 18 years old. If we learn that we have collected personal information from someone under 18, we will deactivate the account and promptly delete that data from our records. If you become aware of any data we may have collected from anyone under 18, please contact us at info@theswiftclub.com.

8. What Are Your Privacy Rights?

In Short: You may review, change, or terminate your account at any time, depending on your state of residence.

Withdrawing your consent. If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us using the contact details provided in Section 12. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information. If you would at any time like to review or change the information in your account or terminate your account, you can log in to your account settings and update or delete your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms, and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at info@theswiftclub.com.

9. Controls for Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

10. Do United States Residents Have Specific Privacy Rights?

In Short: If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Montana, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.

Categories of personal information we collect

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	Yes
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, and employment history	Yes
C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, religion, height, languages, and other demographic data	Yes
D. Commercial information	Transaction information and purchase history	Yes
E. Biometric information	Fingerprints, voiceprints, and facial geometry	No
F. Internet or other similar network activity	Usage data, in-app activity, and interactions with our advertisements	Yes
G. Geolocation data	Device location	Yes
H. Audio, electronic, sensory, or similar information	Images, such as profile photos and verification selfies	Yes
I. Professional or employment-related information	Job title and employer	Yes

Category	Examples	Collected
J. Education information	Student records and directory information	No
K. Inferences drawn from collected personal information	Inferences drawn from collected personal information to create a profile or summary about an individual's preferences and characteristics	No
L. Sensitive personal information	Account login information, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, and sex life or sexual orientation	Yes

We only collect sensitive personal information as defined by applicable privacy laws for the purposes allowed by law or with your consent. Sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You may have the right to limit the use or disclosure of your sensitive personal information. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

Selfie verification

An important aspect of our app is to ensure that all users are authentic and representative of the media portrayed on their profile. Selfie verification allows us to do this. After a successful selfie verification, you receive a badge on your profile to show people that you are really you. You will also see the badge on other Swift Club profiles to make more informed decisions on who you choose to interact with.

How does selfie verification work? Selfie verification consists of two steps. The first is a "Liveness Check," in which you will be guided to follow the directions on the screen. This helps us validate that the face verification procedure is being done by a real live person and has not been digitally altered or manipulated. We do not record, store, or share any data from the Liveness Check step.

After the Liveness Check is passed, we take one selfie of your face using your camera. We store this on our Amazon Web Services (AWS) instances. We keep this selfie in our system for the purposes of auditing and managing this feature, but do not post it to your profile or share it with other users.

What will The Swift Club keep after verification is complete? We will keep the selfie image during the life of your account to audit and manage our selfie verification feature. These images are deleted upon deletion of your account in line with this Privacy Policy.

Under what legal authority does The Swift Club process selfie verification information? We perform and process selfie verification information with your consent.

What is your policy for the retention and destruction of selfie verification data?

- **Retention:** We do not retain any biometric or facial geometry information. During our Liveness Check we use an Apple technology called the TrueDepth API to validate that face verification is

being performed by a real person. No video or data is recorded, stored, or shared from this session. We only keep the selfie image taken with your camera for the purposes discussed above.

- **Destruction:** When you delete your Swift Club account, we delete your profile, including the stored selfie image.

Other information and retention

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information in Categories A, B, C, D, F, G, H, I, and L for as long as the user has an account with us, unless a longer period is required by law.

Sources of personal information

Learn more about the sources of personal information we collect in Section 1.

How we use and share personal information

Learn about how we use your personal information in Section 2.

Will your information be shared with anyone else? We may disclose your personal information to our service providers pursuant to a written contract between us and each service provider, and to our advertising measurement partners. Learn more in Section 3.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We do not sell your personal information for money. We share limited device and app-event data with advertising measurement partners, as described in Section 3, which some US state laws treat as "sharing" for targeted advertising. You can opt out of this sharing by emailing info@theswiftclub.com with the subject "Do Not Share." We do not knowingly sell or share the personal information of anyone under 18.

Your rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data

- Right to request the deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to non-discrimination for exercising your rights
- Right to opt out of the processing of your personal data if it is used for targeted advertising (or "sharing" as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California's and Delaware's privacy law)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Oregon's privacy law)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California's privacy law)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida's privacy law)

How to exercise your rights

To exercise these rights, you can contact us by emailing info@theswiftclub.com, or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

Request verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request, and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at info@theswiftclub.com. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California "Shine The Light" law

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact details provided in Section 12.

11. Do We Make Updates to This Notice?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Last updated" date at the top of this Privacy Policy. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

12. How Can You Contact Us About This Notice?

If you have questions or comments about this notice, you may email us at info@theswiftclub.com or contact us by post at:

Swift Holdings LLC
8 The Green Ste. A
Dover, DE 19901
United States

13. How Can You Review, Update, or Delete the Data We Collect From You?

Based on the applicable laws of your state of residence, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please contact us at info@theswiftclub.com. Members can also log in to the app and delete their account and data through Settings.