

Privacy Policy

Effective Date: January 1, 2026

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1. Introduction

VibeLink Enterprises Inc. (“VibeLink,” “we,” “our,” or “us”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our application and/or our site and/or our services (jointly referred as to the “App”).

2. Information We Collect

a. Personal Information

We collect personal information that you voluntarily provide to us when registering for the App, such as:

- Name.
- Email address.
- Phone number.
- Educational institution.
- Profile photo.
- Other information you choose to provide.

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.

b. Usage Data

We automatically collect certain information when you use the App, including but not limited to:

- IP address.
- Device information.
- Browser type.
- Operating system.
- Usage patterns.
- Location data (approximate).

c. Information about your engagement with Commercial Partners

When you voluntarily interact with a Commercial Partner’s profile, promotion, advertisement, offer, or other promotional feature within the App, we may collect information about that interaction, including:

- the Commercial Partner with whom you interacted;
- the type of interaction or engagement;
- the date and time of the interaction;
- the promotion, profile, or feature with which you interacted;
- engagement information such as a promotion click or profile follow; and
- other information reasonably necessary to administer, measure, or document the interaction.

If you voluntarily engage with a Commercial Partner, certain information associated with your account may be disclosed to that Commercial Partner, as described in Section 4 of this Privacy Policy.

Depending on the feature and applicable law, the information disclosed may include your:

- full name;
- university email address;
- class year, if you have provided it;
- major, if you have provided it; and
- the date and time of the engagement.

We do not disclose unrelated personal information merely because you maintain an account with VibeLink.

3. How We Use Your Information

VibeLink Enterprises Inc. processes your personal information only when we believe it is necessary and we have a valid legal basis under applicable law. This includes obtaining your consent, fulfilling contractual obligations, complying with legal requirements, protecting your rights, or pursuing our legitimate business interests. The use by you of the App and/or certain services accessible through the App may be subject to your acceptance of separate agreements with us or any other third parties. We use the information we collect to:

- Provide and maintain the App.
- Improve user experience.
- Deliver our services.
- Communicate with you.
- Monitor and analyze usage.
- To contact you about events, publications and services that we provide.
- To better understand how you interact with our services.
- Ensure security and prevent fraud.
- Comply with legal obligations.
- Research and analytics purposes.
- To enforce and protect our rights and the rights of others, including to assist law enforcement, campus police, or other authorities.

- To provide Commercial Partners with promotional, visibility, discovery, and engagement services.
- To facilitate voluntary interactions between students and Commercial Partners.
- To measure engagement with Commercial Partner profiles and promotions.
- To provide Commercial Partners with engagement analytics associated with their promotional activities.
- To facilitate introductions or discovery opportunities between Commercial Partners and student organizations.
- To administer, monitor, and enforce our agreements with Commercial Partners.
- To prevent misuse of student information by Commercial Partners.
- To comply with applicable privacy, advertising, communications, consumer-protection, and other laws governing promotional activities.
- For other purposes with your consent.

The list included herein is not exhaustive.

For Users in the EU and UK

If you are located in the European Union or the United Kingdom, the General Data Protection Regulation (GDPR) and UK GDPR apply to our data processing activities. Under these regulations, we rely on the following legal bases to process your personal information:

1. **Consent:** We may process your information if you have given us specific consent for a particular purpose. You have the right to withdraw your consent at any time. To learn how to withdraw your consent, contact us indicated in this Privacy Policy.
2. **Legitimate Interests:** We may process your information when it is necessary to achieve our legitimate business interests, provided that such interests do not override your fundamental rights and freedoms. Examples include:
 - Sending you updates about new features, products, or services.
 - Developing and delivering targeted advertising content.
 - Analyzing service usage to improve user engagement and experience.
 - Supporting marketing activities and promotional offers.
 - Understanding user behavior to enhance product and service delivery.
3. **Legal Obligations:** We may process your information when it is necessary to comply with applicable legal obligations, such as cooperating with law enforcement, complying with a court order, or defending our legal rights in a legal proceeding.
4. **Vital Interests:** We may process your information to protect vital interests, including safeguarding the life, health, or safety of individuals. This may apply in emergency situations or where there is a significant risk to public health or safety.

In legal terms, VibeLink Enterprises Inc. is the “data controller” of the personal information processed under this privacy policy. If we process personal information on behalf of a third party, such as a university or business partner, we act as a “data processor” and process such information strictly according to their instructions.

For Users in Switzerland

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

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 as indicated in this Privacy Policy.

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.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us as indicated in this Privacy Policy. You will then be removed from the marketing lists. However, we may still communicate with you—for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Cookies may be accepted by a default option in our website. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our services.

For Users in Canada

If you are located in Canada, the Personal Information Protection and Electronic Documents Act (PIPEDA) governs our data processing activities. We may process your personal information based on the following legal grounds:

1. **Express Consent:** We may collect, use, and disclose your personal information with your specific permission for a defined purpose. You may withdraw your consent at any time by contacting us as indicated in this Privacy Policy.
2. **Implied Consent:** In some cases, your consent may be implied, such as when you voluntarily provide information in the context of using our services.
3. **Exceptions to Consent:** In certain situations, we may process your information without consent, including but not limited to:
 - When collection is in the best interest of an individual and consent cannot be obtained in a timely manner.
 - For fraud detection and prevention.
 - During business transactions under specified conditions.
 - When the information is included in a witness statement and is required to assess, process, or settle an insurance claim.
 - When necessary to identify, contact, or notify next of kin in cases of injury, illness, or death.
 - If we reasonably believe an individual may be a victim of financial abuse.

- If the information is collected in connection with investigating a breach of law or contractual obligations.
- When required by law, such as in response to a court order, subpoena, or warrant
- If the information is publicly available and listed in the regulations.

For Users in the United States (California, Virginia, Utah, Connecticut, Colorado)

If you are a resident of Virginia, Utah, Connecticut, Colorado, or California, you have specific rights regarding the access and use of your personal information under state laws such as the California Consumer Privacy Act (CCPA), Virginia Consumer Data Protection Act (VCDPA), Utah Consumer Privacy Act (UCPA), Connecticut Data Privacy Act (CTDPA), and Colorado Privacy Act (CPA). These rights include:

- Right to access personal information.
- Right to request deletion of personal information.
- Right to correct inaccuracies in personal information.
- Right to obtain a copy of personal information shared with us.
- Right to opt out of the sale or sharing of personal information.
- Right to limit the use of sensitive personal information.

You may submit a Request to Know, Request to Delete, or Request to Correct through our web portal, available [here](#), or contact us as indicated in this Privacy Policy.

Once you submit a request, we will verify that you are the consumer to which the request pertains by matching your name, email address, physical address, telephone number, email address, a security code, or similar information we maintain. If we are unable to verify your request with the data points you provided, we may reach out to you for additional information to verify your request.

Residents of California, Colorado, and Connecticut may designate an authorized agent to submit a request on your behalf or delete your personal information. To do so, you must: (1) provide that authorized agent written and signed permission to submit such request; and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

If you are a Colorado, Connecticut, or Virginia resident, you may appeal our decision to your request regarding your personal information. To do so, please contact us as indicated in this Privacy Policy. We respond to all appeal requests as soon as we reasonably can, and no later than legally required. If you have concerns about the result of your appeal, you may contact the attorney general of your state.

If you have a disability that prevents or limits your ability to access this Privacy Policy, please contact us as indicated in this Privacy Policy. We will work with you to provide it in an alternative format.

Commercial Partner Disclosures and Privacy Choices

Certain disclosures of personal information to Commercial Partners may be subject to privacy rights or choices under applicable state law, including rights to opt out of certain forms of sale, sharing, targeted advertising, or other processing.

Where applicable law provides you with a right to opt out, VibeLink will provide the applicable opt-out mechanism and will honor a valid request in accordance with the law.

Your decision to opt out of a legally defined sale, sharing, targeted advertising, or similar processing will not prevent you from using the App except to the extent that a particular feature necessarily depends on the applicable processing.

A request to opt out of marketing communications is different from a request to opt out of a legally defined sale or sharing of personal information. You may unsubscribe from marketing emails using the unsubscribe mechanism included in those communications, while privacy requests concerning personal information may be submitted through the privacy contact or mechanism described in this Privacy Policy.

For any further details, please contact us as indicated in this Privacy Policy.

4. Sharing Your Information

We may disclose personal information to the following categories of recipients, depending on how you use the App and as permitted by applicable law:

- service providers that help us operate, secure, maintain, and support the App;
- affiliates and subsidiaries;
- law enforcement, regulators, courts, or governmental authorities where required or permitted by law;
- other users, administrators, student organizations, or participants where necessary to provide features you choose to use;
- universities or other institutional partners where authorized and appropriate;
- Commercial Partners as described below; and
- other parties where you direct us to make the disclosure or otherwise provide appropriate authorization.

VibeLink does not offer personal information as a standalone data product or provide personal information to data brokers. However, certain disclosures to Commercial Partners may constitute a sale, sharing, targeted advertising, or other regulated disclosure under applicable law depending on the circumstances. Where required by applicable law, VibeLink will provide the applicable notice, consent mechanism, or opt-out right.

Commercial Partners

VibeLink provides businesses and other commercial organizations (“Commercial Partners”) with promotional and visibility services through the App. Commercial Partners may pay VibeLink for

services such as promotional placements, company profiles, engagement analytics, and discovery or introduction opportunities involving student organizations.

A Commercial Partner does not receive your personal information merely because you have an account with VibeLink or because the Commercial Partner advertises on the App.

When you voluntarily engage with a Commercial Partner's profile, promotion, advertisement, offer, or other designated promotional feature, VibeLink may disclose certain information associated with that engagement to the applicable Commercial Partner.

Depending on the feature and applicable law, the information may include:

- your full name;
- your university email address;
- your class year, if you have provided it;
- your major, if you have provided it; and
- the date and time of your engagement.

The information disclosed is intended to allow the Commercial Partner to understand and respond to your voluntary engagement and to support legitimate promotional, informational, or follow-up activities related to that engagement.

Commercial Partners are independent third parties. VibeLink does not control their privacy practices, and their subsequent use of information is governed by their own legal obligations and privacy policies, as well as any contractual restrictions imposed by VibeLink.

VibeLink does not negotiate agreements between Commercial Partners and students or student organizations, does not process payments between them, does not receive commissions based on their subsequent transactions, and is not a party to any subsequent transaction or relationship between them.

Data from Universities and Education Records

VibeLink may provide services to universities, colleges, student organizations, and other educational or institutional entities. If VibeLink receives personal information or education records from a university or other educational institution in connection with institutional services, VibeLink will process that information in accordance with the applicable institutional agreement, data-processing terms, and applicable law.

Unless expressly authorized by the applicable institution and permitted by law, VibeLink will not disclose education records or institutional data received from a university to Commercial Partners for advertising, marketing, lead-generation, or other commercial purposes.

Where applicable, VibeLink may act as a service provider or processor on behalf of an institution. In such circumstances, the institution may determine the purposes and means of

processing and may impose additional requirements concerning access, use, retention, deletion, security, and disclosure.

5. Data Retention

We retain personal information only for as long as necessary to fulfill the purposes described in this Privacy Policy and to comply with legal obligations.

Retention is determined based on the following criteria:

- Account Information: retained while your account is active and for up to 30 days after account deletion to allow restoration and prevent fraud.
- User Content (posts, messages, profile information): deleted or anonymized within 30 days after account deletion, except where required for legal or safety purposes.
- Usage and Analytics Data: retained in de-identified or aggregated form and may be stored indefinitely.
- Support Communications: retained for up to 24 months for dispute resolution and service improvement.
- Security Logs: retained for up to 12 months to detect and prevent abuse and unauthorized activity.

Backups may persist for a limited period but are automatically overwritten within 60 days.

You may request deletion of your account at any time. Upon verified request, we will delete or anonymize your personal information subject to legal retention requirements and legitimate security needs.

Information associated with Commercial Partner engagements will be retained only for as long as reasonably necessary to provide the relevant service, maintain appropriate business and security records, comply with legal obligations, resolve disputes, enforce agreements, and document privacy choices. Where personal information is no longer required for those purposes, it will be deleted, anonymized, or aggregated in accordance with our retention practices and applicable law.

Information that has been properly de-identified or aggregated may be retained for longer periods and may be used for analytics, research, service improvement, security, and other legitimate business purposes, provided that the information is not reasonably capable of identifying an individual.

6. Your Rights

Depending on your location, you may have the following rights regarding your personal information:

- Access and obtain a copy of your data.
- Correct inaccuracies in your data.

- Delete your data.
- Object to or restrict processing of your data.
- Data portability.

To exercise these rights, please contact us as indicated in this Privacy Policy.

7. Data Security

We implement appropriate technical and organizational measures to protect your personal information from unauthorized access, use, or disclosure. However, no method of transmission over the Internet or electronic storage is 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.

8. Children's Privacy

The App is intended for individuals who are at least eighteen (18) years old. VibeLink does not knowingly permit individuals under eighteen (18) to register for or use the App. The App is not directed to children under thirteen (13), and VibeLink does not knowingly collect personal information from children under thirteen (13).

If we learn that we have collected personal information from an individual under eighteen (18), we may deactivate the account and take reasonable measures to delete the information, subject to applicable law and legitimate legal, security, fraud-prevention, or safety requirements.

If we learn that we have actual knowledge that we have collected personal information from a child under thirteen (13) in circumstances requiring parental consent under applicable law, we will take the steps required by applicable law.

If you believe that an individual under eighteen (18) has registered for or is using the App, please contact us using the contact information provided below.

9. Changes to This Privacy Policy

We may update at our sole discretion this Privacy Policy from time to time and with no previous notice to you. We will notify you of any changes by updating the "Last Updated" date at the top of this Privacy Policy. Therefore, you should check the Effective Date of this Privacy Policy each time that you visit our site or the App to learn what has changed since the last time you visited.

10. Contact Us

For privacy requests concerning Commercial Partner disclosures, including requests to access, correct, delete, or opt out of certain processing where provided by applicable law, please contact us at the address or email provided below.

Where applicable, VibeLink may require reasonable verification of your identity before processing a privacy request.

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