



Law Enforcement Guidelines

Table of Contents

1. [Introduction](#)
2. [Our Apps Explained](#)
3. [How do You submit a request for data?](#)
4. [What user account information is stored?](#)
5. [How long is the Account Information stored for?](#)
6. [What information is required to search for an account?](#)
7. [What other details should be included in a request?](#)
8. [Where should the request be addressed to?](#)
9. [What type of request can be submitted electronically via Kodex?](#)
10. [How do I submit an Emergency Disclosure Request?](#)
11. [Country specific legal requirements](#)
12. [Profile Removal Requests](#)
13. [Records Authentication](#)
14. [Preservation Requests](#)
15. [FAQ's](#)

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Introduction

These guidelines are intended to assist an authorised government official or law enforcement agency (“**You**”, “**Your**”, “**Yours**”) seeking to make a data request to the Bumble Inc. Group (“**Us**”, “**Our**”, “**We**”).

Our Apps Explained

Bumble App: Bumble, the women-first dating and social networking app, was founded by CEO Whitney Wolfe Herd in 2014. Bumble connects people across dating (Bumble Date), friendship (Bumble BFF) and professional networking (Bumble Bizz). Bumble is built on the importance of equitable relationships and how crucial they are to a healthy, happy life. We have built our platform around kindness, respect, and equality – and our community plays an important part in that. Bumble holds its users accountable for their actions and strives to provide them with an experience free from hate, aggression, or bullying. Bumble is free to download and is widely available in the Apple App Store, Google Play Store and the web. For additional information on the Bumble App, please take a look at our Help Centre [here](#).

Badoo App: Launched in 2006, Badoo is a pioneer in modern dating and strives to make dating less complicated and more fun. It encourages a community of users that are clear about their intent, are authentically themselves, and behave respectfully to all – so everyone can enjoy the best parts of dating. With millions of users across the globe, Badoo is a freemium service, which offers additional premium subscriptions to users. The app is available from Apple App Store, Google Play Store, Huawei AppGallery and the web. Badoo is part of Bumble Inc. For additional information on the Badoo App, please take a look at our Help Centre [here](#).

Fruitz App: Fruitz was founded in Paris in 2017 by Julian Kabab, Fabrice Bascoulergue and Arnaud Ruols, and has become one of the fastest growing dating apps in Europe. The French app encourages open and honest communication of dating intentions through four playful fruit metaphors – cherries, grapes, watermelons, and peaches. The app is available from Apple



App Store, Google Play Store and the web. Fruitz is part of Bumble Inc. For additional information on the Fruitz App, please take a look at our Help Centre [here](#).

How do You submit a request for data?

All requests must be correctly submitted via Our dedicated law enforcement request portal(s) (“**Kodex**”) via:

Bumble: <https://app.kodexglobal.com/bumble/signin>

Badoo: <https://app.kodexglobal.com/badoo/signin>

Fruitz: <https://app.kodexglobal.com/fruitz/signin>

Kodex allows You to submit, track, and securely receive data submissions. Kodex also allows You to communicate directly with Our Law Enforcement Operations Team.

You will first need to register an account with Kodex and provide information to permit Kodex to verify You as a legitimate law enforcement official. If the request is deemed an [Emergency Disclosure Request](#), the case will be worked on whilst verification is completed by Kodex in order to not cause a delay in handling.

Please note that We will not respond to any requests submitted via fax, phone, email or letter or any requests made by unauthorised persons. If submitted via mail, law enforcement officials should expect longer response times.

What user account information is stored?

When users download Our apps, create an account, and make purchases, We may collect certain information (“**Account Information**”) about them, such as:

- Identifiers, such as name and location;
- Personal information, such as contact (including email and telephone number) and financial information;

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- Characteristics of protected classifications, such as age, gender identity, marital status (when applicable), sexual orientation, race, ancestry, national origin, religion, and health information;
- Commercial information, such as transaction information and purchase history;
- Biometric information;
- Internet or network activity information, such as interactions with our Bumble, Badoo, BFF or Fruitz websites and associated applications as outlined above.
- Geolocation data, such as mobile device location;
- Audio, electronic, visual and similar information, such as photos and videos;
- Professional or employment-related information;
- Non-public education information; and
- Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

How long is the Account Information stored for?

We may hold different types of information for different lengths of time in accordance with our internal retention policy. For example, there are different retention periods for users who delete their account or are blocked.

Privacy Policy
Bumble
Badoo
Fruitz

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** A user may choose to delete their account at any point. If an account has already been deleted by the user at the time of the request, please enquire with the Law Enforcement Operations Team, via the Quick Questions section on Kodex, to ascertain if certain data is available for disclosure.*

What information is required to search for an account?

We will need the name of the account holder and at least **ONE** of the following in order for Us to successfully locate a profile:

- registered email address
- registered or linked mobile/cell phone number
- unique user ID number.

Please contact Us via the “Quick Questions” option located in Kodex if you have any queries or issues relating to account identifiers.

Credit Card Requests: For requests related to credit card transactions, please provide Us with the following so We can provide You with the correct payment provider’s details:

- last 4 digits of the credit card number
- card type (i.e Visa, Mastercard, American Express)
- issuer country (i.e United Kingdom/United States)
- cards expiry date (e.g. 05/23)
- name on the card.

Please do not provide the full primary account number (the long number located on the payment card) as we do not hold this information in accordance with the [Payment Card Industry Data Security Standards](#).



What other details should be included in a request?

To ensure timely processing, all data requests must include:

- a detailed reason for the request, including the nature and citation of the crime (see also emergency disclosure section below if relevant)
- what data is being requested
- the specific, relevant date range to be searched
- a named point of contact, including department and title with a contact phone number
- an attachment of the legal process (if applicable); such as a subpoena, search warrant, IPA notice, or production order.

Where should the request be addressed to?

All US Based data requests relating to the Bumble or Badoo app are subject to US law. US based requests should be addressed to: **Bumble Trading LLC, 1105 West 41st Street, Austin, Texas, 78756, United States of America.**

*Note US-based submissions for Badoo are addressed to **Bumble Trading LLC**

If you are located outside of the US, all Bumble and Badoo app requests are subject to the laws of England & Wales. For these requests:

- Bumble App data requests should be addressed to: **Bumble Holding Limited, The Broadgate Tower, Third Floor, 20 Primrose Street, London EC2A 2RS, United Kingdom.**

- Badoo App data requests should be addressed to: **Badoo Trading Limited, The Broadgate Tower, Third Floor, 20 Primrose Street, London EC2A 2RS, United Kingdom.**

All Fruitz app data requests are subject to the laws of France and the European Union. Fruitz app data requests should be addressed to: **Flashgap SAS, 71 rue du Faubourg Saint Martin, 75101 Paris France.**



What type of request can be submitted electronically via Kodex?

- Emergency Disclosure
- Warrant
- Subpoena
- IPA Notice
- Production Order
- Court Order
- Mutual Legal Assistance Treaty Request
- Profile Removal
- Records Authentication
- Preservation Request

How do I submit an Emergency Disclosure Request?

We may provide an expedited response to a legal request for available information if the information relates to an emergency situation where We have reason to believe there is an imminent danger of death or serious physical injury to any person.

In order for us to be able to treat Your request as an Emergency Disclosure Request, We will need to be provided with enough information for Us to form a reasonable belief that the situation is an emergency. Please ensure that Your request includes full information about the reason that the situation is an emergency. If there is not enough information for Us to establish that there is an emergency, We are obliged to either reject Your request or delay Our response while We seek further information from You.

Examples of scenarios where We would deem a case to be an emergency situation include:

- current kidnapping or missing person situation;
- active sexual assault, including but not limited to child sexual abuse;
- school shooting threats when serious and imminent;
- acts of terrorism;
- A Grade 1 Emergency (an imminent threat to life) as per UK Home Office guidelines; or
- any other instances where the life of a person is in serious and imminent danger.



When making the request via Kodex select “Emergency” as the Legal Process. The response to Your request may be delayed if insufficient information about the emergency situation is provided.

Country specific legal requirements

United Kingdom

We disclose data in accordance with applicable UK laws and in response to specific legal requests such as s 67 Notices under the Investigatory Powers Act 2016 (**IPA**) and Production Orders issued pursuant to section 345 of the Proceeds of Crime Act 2002 (**POCA**). IPA submissions must be submitted to Us via the Communication Data Investigation Single Point of Contact (**SPoC**) process. Each law enforcement agency within the UK has its own SPoC unit which can be found on the National Communications Data Services tool. Production Orders and Preservation Requests may be submitted via individual officers as long as the correct legal process has been undertaken.

All requests from UK police forces are to follow the Home Office guidance of utilising the SPoC process for IPA submissions. The Home Office Knowledge Engagement Team recommends that the preferred method of submitting court authorised production orders/preservation requests is via the SPoC process, but if necessary they can be submitted directly by an officer via Kodex.

United States

We disclose data in accordance with applicable United States laws including the Stored Communications Act (**SCA**). These disclosures can only be made in response to specific legal requests including subpoenas and search warrants.



Rest of World

Unless a request is a valid emergency disclosure request, We are unable to disclose **any** data to a law enforcement agency outside of the UK or United States unless in response to a valid request made to Us by a UK law enforcement agency or UK Court order pursuant to a Mutual Legal Assistance Treaty (**MLAT**) request.

The UK Central Authority (**UKCA**) coordinates MLAT requests and further information on how to make a request is available on their website; [Request for Mutual Legal Assistance in criminal matters: guidelines for authorities outside the UK](#).

Fruitz

We disclose data relating to the Fruitz app only, in accordance with applicable French and EU laws including the French Criminal Procedure Code. Disclosures of all data can only be made in response to specific legal requests from a French Court Judge through Judicial orders or French Police officers under an independent judge authorisation.

Profile Removal Requests

We will remove profiles reported by You where the request is made to Us through the proper channels and/or when required by law. Please contact Us via the Quick Questions option in Kodex if You wish for Us to remove an active profile and We will review the request and get back to You accordingly.

Records Authentication

If requested, we can provide Our standard Certificate of Authenticity to accompany data submissions. We do not provide in person testimony or expert witness. If you have any questions, please contact us via the Quick Questions option in Kodex.

Preservation Requests

We will honour a preservation request made by You to preserve information in accordance with legislation, including 18 U.S. Code § 2703(f) and relevant UK law. Any preservation request must be accompanied by a signed and dated request on official



letterhead. We will preserve the relevant data pursuant to a valid preservation request for an initial 90 days. We may also honour ONE further extension for an additional 90 days. If an extension is required You must submit an additional request clearly marked as an extension via Kodex and include a new signed and dated request on official letterhead.

You are responsible for tracking the 90 day expiration dates of Your preservation request. We will not be held responsible for expiration of the requests. We reserve the right to delete any account that violates our terms and conditions.

FAQ's

Will users be notified of requests from Law Enforcement?

Our standard policy is that we do not disclose any of these requests for data or information to our users or the public.

What is the expected time to receive a response to a request?

We aim to process all requests within a few working days, but on some occasions, it may take up to 30 days to get the information across to you.

Is there any training available on the process?

We want to work collaboratively with You, as appropriate. Should You be interested in attending a training session that We hold for law enforcement agencies to learn more about Our processes, please create a new submission via Kodex under "Quick Questions."

These guidelines are regularly reviewed by Us and are subject to change at Our discretion.