

Privacy Policy

Last Revised: July 10, 2017

This Privacy Policy explains the practices of Cybba Inc. ("Cybba", "we", "us", or "our") regarding information we obtain by and through your use of Cybba's website, located at www.cybba.com, (the "Site") and the services provided through the Site (the "Services"). It also describes your choices regarding use, access and correction of your personal information. This Privacy Policy, together with the Terms & Conditions, governs your use of the Services. If you have questions or complaints regarding our privacy policy or practices, please contact us.

By using the Site or the Services, you are accepting and consenting to the use of your information as described in this policy.

The use of information collected through the Services shall be limited to the purpose of providing the service for which you have engaged Cybba.

Cybba collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Clients. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to the Cybba's Client (the data controller). If requested to remove data, we will respond within a reasonable timeframe.

We will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. Cybba will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

1. Acceptance of the Privacy Policy.

Each time you access, use or browse the Site or interact with Services, you signify your acceptance of the then-current Privacy Policy. If you do not accept this Privacy Policy, please do not provide information to us.

Should the Privacy Policy be revised, we will notify you by means of a notice on this website prior to the change becoming effective. Material changes in the manner that we use or share personally identifiable information that applies to information collected prior to the posting of the revised Privacy Policy, will only be made in accordance with applicable law. You can determine when the Privacy Policy was last revised by referring to the "Last Revised" legend at the top of this page.

2. Information We May Collect From You.

<u>Using the Services</u>. We collect certain information to help us operate and provide the Services to you. We collect this "Technical Information" when you use the Services, including:

- Information about the device(s) you use to access the Services, including MAC address, IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device type, and device identifiers;
- Information about your visits to the Site, including the full URL clickstream to, through and from pages on the Site (including date and time);
- Information we need and use to facilitate your use of the Site (including to provide access to third party websites and services), such as URL requests, destination IP addresses, or device configuration details;
- Pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

<u>Information You Provide to Us</u>. If you send us an email, fill out a feedback form, call us, or choose to communicate with us in another way, we will collect that information in order to respond to your request, feedback, or question. We will use and share information you provide to us only as described in this Privacy Policy.

<u>Personally Identifiable Information</u>. Some of the information we collect through your use of the Services or communications with us, such as your name or email address, may personally identify you. We will treat this information as "Personally Identifiable Information." We will also treat as Personally Identifiable Information any non-identifiable information that is combined with Personally Identifiable Information.

<u>Aggregate or Anonymized Information</u>. We may combine Technical Information or non-Personally Identifiable Information about your use of the Services with similar information we obtain from other users for use in an aggregate or anonymous manner.

3. Other Collection of Information.

We will not ask for or request sensitive information such as government identifiers, medical information, or financial information (other than for payment of optional services). Please do not provide this information to us through emails, feedback forms or in any other way.

We may offer additional paid products and services. These products and services are separate from the Services, but this Privacy Policy will also apply to information we collect in connection with such paid products and services. For paid products and services, we will collect payment information in order to process any order from you.

4. How Your Information May Be Used.

We may use any information we collect to:

 Allow us to operate the Services, including administration, internal operations, troubleshooting, data analysis, testing, research, statistical and survey purposes;

- Manage your access to the Services;
- Send you information that allows you to use the Services;
- Comply with laws and regulations, such as to comply with a subpoena, bankruptcy proceedings, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- Maintain the security of the Services.

We may use Technical Information or non-Personally Identifiable Information to:

- Improve the Services and present content in the best way for you and for your device(s);
- Serve advertisements on websites we provide that relate to the Services;
- Measure or understand the effectiveness of advertising we serve to you and other customers like you, and to deliver relevant advertising to you.

We may use your information, including Personally Identifiable Information, to:

- Provide you with information about goods or services that may interest you;
- Send you emails about updates, information, or alerts regarding the Services.

5. How We Share Your Information.

We may share any information, including Personally Identifiable Information with:

- Service providers and sub-contractors to the extent reasonably necessary to enable us to provide the Services. These companies are authorized to use your personal information only as necessary to provide these services to us;
- A third party that acquires Cybba or a majority of its assets, if that third party obtains the rights to provide the Services and subject to the provisions of this Privacy Policy;
- A third party with whom we must legally share information about you;
- You, upon your request;
- Other third parties with your express consent to do so.

We may share non-Personally Identifiable Information, aggregate or anonymous data:

- With analytics, search engine, or other service providers that help us improve the Services;
- In the event that we receive a request from a governmental entity to provide it with your Personally Identifiable Information, we will take reasonable attempts to notify you of such request, to the extent possible.

6. Our Use of Cookies and Other Tracking Mechanisms.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We do not link this automatically collected data to other information we collect about you.

We and our marketing partners, affiliates, or analytics or other various service providers, use

technologies such as cookies, beacons, tags, and scripts, to analyze trends, administer the website, tracking users' movements around the website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

When you use the Services, Cybba's servers will automatically record information that your browser sends. This information may include, but is not limited to, unique identifiers associated with the computing and/or mobile device, operating system type, Internet Protocol ('IP') address, browser type, user session duration, traffic data, location data, search data, transaction data and other communication data.

Like many websites, the Site may also use cookies, web beacons or similar technologies to collect information about how our Services are used. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Services or all functionality of the Services.

We partner with a third party to either display advertising on our website or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this website and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

We use Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use Flash cookies and HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5. To manage Flash cookies, please click here:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings manager07.html

Frames

Some of our pages utilize framing techniques to serve content to/from our partners while preserving the look and feel of our website. Please be aware that you are providing your personal information to these third parties and not to Cybba's Site.

7. Your Choices.

You have certain choices to control the collection and use of information about you by the Services. By opting out of website or mobile device tracking, you can limit the information that is collected and/or how it is used. If your personal information changes, or if you no longer desire our service, you may correct, update, amend, or ask to have it removed from a public forum on our site or deactivate it by making the change on our member information page or by contacting us by telephone or postal mail at the contact information listed below. We will respond to your request within a reasonable timeframe.

8. Opt-out Process for Websites.

For websites who use the Services, Google® allows individuals to opt-out of certain interest-based advertising through its platform. You can review and modify these choices. The websites you visit may still collect information for other purposes. You may need to separately set your preferences for each browsers or device that you use. Deleting browser cookies may remove your opt-out preferences, so we recommend that you visit this site periodically to review your opt-out settings.

For mobile applications that use the Services, you may choose to opt-out through your device settings.

9. Links to Other Websites.

This Privacy Policy applies only to the Services provided by Cybba, not to any third party websites. Please contact the third party websites directly for information on their privacy, security, data collection and distribution policies.

10. Security.

We have reasonable security measures in place intended to protect against the loss, misuse or alteration of any personal information collected. However, we are unable to guarantee that the security measures we take will not be penetrated or compromised or that your information will remain secure under all circumstances.

11. Data Retention.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

12. Children.

We do not knowingly collect Personally Identifiable Information from children under the age of 13 via any App or Website. We do not allow our services to be used to create interest-based profiles based on information collected from child-directed apps. If you have reason to believe that your child under the age of 13 has provided Personally Identifiable Information to Cybba, you may contact us as described below if you would like us to delete that information from our databases and we will endeavor to fulfill your request.

13. California (USA) Privacy Rights - Notice to Residents of Compliance

California law requires that we provide you with a summary of your privacy rights under the California Online Privacy Protection Act ("California Privacy Act") and the California Business and Professions Code.

As required by the California Privacy Act, this Privacy Policy identifies the categories of personally identifiable information that Cybba collects through its Services about individual users who use or visit the Services and the categories of third party persons or entities with whom such personally identifiable information may be shared.

California Civil Code Section 1798.83 permits users of the Services who are residents of California to request certain information regarding the disclosure of personal information by Cybba to third parties for direct marketing purposes and a description of the categories of personal information shared. To make such a request, please send an e-mail to us at info@cybba.com and include the phrase "California"

Privacy Request" in the subject line. The body of the California Privacy Request should include the domain name of the website you are inquiring about as well as your personal contact information (e.g., your name, address and email address). Cybba support staff will respond to your request within thirty (30) days of its receipt of such a request.

14. Changes to this Privacy Policy.

We may change this Privacy Policy from time to time, and will post prior notice of any such changes on the Site. Our use of information collected prior to a material change in this Privacy Policy shall continue to be governed by the Privacy Policy that is in effect at the time the information was collected, unless you opt in to allow the information to be governed by the new policy. Please refer back to this Privacy Policy on a regular basis.

15. Questions or Feedback

If you have any questions or comments regarding our privacy policy and practice, please email us at info@cybba.com.

EFFECTIVE DATE: July 10, 2017