

**Effective Date: December 18, 2019**

## **I. GENERAL**

This privacy notice sets out how Sabio Mobile Inc. DBA Sabio, Inc. ("Sabio" or "we") use and protect any information that we may collect about you when you visit our website <https://sabio.inc/> (the "Website"), correspond with us, or when you interact with our Services (as described below).

Sabio Inc. offers mobile application data analytics solutions and mobile advertising products and services (the "Services") to its customers. The Services rely on the analysis of behavior the users of mobile applications. Security and data protection are the cornerstones of the Services and we wish to be fully transparent about our Services. Insofar as our Services process Personal Information, this Privacy Notice applies.

## **II. WHAT WE MEAN BY "PERSONAL INFORMATION"**

For purposes of this Privacy Notice, "Personal Information" means any information from or about a person or, where applicable, a household, that either reasonably identifies that person or, where applicable, a household, directly or that makes that person or, where applicable, a household, reasonably identifiable when it is combined with other information from or about that person or, where applicable, a household from any source.

## **III. WHAT DATA DO WE COLLECT AND FROM WHAT SOURCES?**

### **(1) Data Collected Automatically**

Most of the data we collect in and through the Website and the Services is technical in nature and is collected and processed automatically through so-called application programming interfaces, software development kits, cookies and similar software-based technologies used in mobile applications. Alone or in combination with other data, such automatically collected data may constitute Personal Information. The data we may collect by such automated means may include:

- Device data: including data on device advertising ID's and similar hardware qualifiers, and precise geolocation of the device;
- Applications: including data on the existence, characteristics and behavior applications (*e.g.*, version, language, preferences);
- Network and internet information: including URLs, IP addresses, bounce rates, use of spoofing, active (TCP/IP) ports, number of sessions initiated, click streams, location information and network/Wi-Fi access points; and
- Information we collect on the use of the Website via cookies. Please see the section "How do we use cookies" below for more information.

We may also link an advertising ID to additional information received from our partners to provide us with some information about mobile device users' likely interests. Specifically with respect to precise geolocation information, we may match the device location to certain geographic points of interest (for example, "home improvement store", "movie theater" "house", or "neighborhood").

Google Analytics is an element of the Website. By using cookies, Google Analytics collects and stores data such as time of visit, pages visited, time spent on each page of the Website, the Internet Protocol address, and the type of operating system used in the devices used to access the Website. By using a browser plugin available at <http://www.google.com/ads/preferences/plugin/> provided by Google, you can opt out of Google Analytics.

### **(2) Data Received from Third Parties**

In connection with the Services, we may receive data from our business partners and other third parties in accordance with their privacy policies. Alone or in combination with other data, such third-party provided data may constitute Personal Information. Such data may include:

- Device data: including data on device advertising ID's and similar hardware qualifiers, operating system, language, and precise geolocation of the device;
- Mobile application and website data: browser type, IP-address, app identifier, website identifier, website and app content; and
- Mobile application and website user data: Year of birth, gender, user identifier.

### **(3) Data You Provide to Us**

When you use the Website or otherwise communicate with us, we collect data that you provide to us directly. For example, we collect data in the following circumstances: when you sign up for a newsletter, when you contact us via the Website; and when you otherwise communicate with us.

The data you provide to us directly may include the following information that may, alone or in combination with other data, constitute Personal Information:

- Information you provide through our 'Contact Us' section, including your name, e-mail, inquiry, and any other information you decide to provide;
- Information you provide via email or using the contact details listed on various parts of the Website, including your name, company, and phone number, and any other information you provide to us;
- If you are one of our customers, suppliers or prospects, we may process limited Personal Information in the course of our business relation with you, for example when you place an order, request a demo or vice versa. Such Personal Information may include your name, company, title, e-mail address, telephone number, address, order details, and where applicable and relevant, credit registrations and credit limits;
- Transaction and limited (non-PCI) payment data; and
- Other information: We may also collect any other information you may want to share with us, such as Personal Information related to recruitment / job applications. Moreover, if you contact us, a record of this correspondence may be kept.

## **IV. PURPOSES FOR OUR COLLECTION AND USE OF PERSONAL INFORMATION**

The data collected automatically and data received from third Parties in connection with the Services is used to for the following purposes:

- Targeting advertising;
- Building audience segments for advertising;
- Analytics and/or market research;
- Improving the relevance of advertising;
- Identifying possible relationships among different browsers and devices;
- Limiting the number of times a specific advertisement is presented to the same mobile device (frequency capping);
- Providing an advertisement to only certain types of mobile devices; and
- Providing a report to a client on the number of its advertisements that were clicked.

We use the Personal Information you provide to us when you contact us in relation to enquiries, orders, comments or complaints made by you for conducting business with you and for our legitimate interest of communicating with you about our products and services. With your consent (unless otherwise permitted by

applicable law) we use the Personal Information you provide us via our Website to send you information on our products and services, special offers and other information based on the interests that you have indicated to us. If you do not wish to receive such information, you can indicate so via the details directly below or the links provided in our emails. If you are one of our customers, suppliers or prospects, we use Personal Information about you to communicate with you, to establish advertiser and publisher accounts on our platform, and otherwise as necessary to conduct our business. This may include verifying your identity, communicating with you and arranging the provision of products and services. We also use Personal Information about you for our legitimate interests of documenting and managing our internal administration.

We use the Personal Information we obtain from the use of the Website to better understand how you interact with the Website and services we offer via the Website, to monitor aggregate usage by our users and web traffic routing on the Website, and to improve the Website and services offered via the Website.

In addition to the above, we use Personal Information in order to comply with applicable laws and for our legitimate purposes of protection our legal rights and the data we process, in connection with legal claims, and for compliance, regulatory, and investigative purposes. This may include sharing the Personal Information with third parties, such as governmental authorities or law enforcement officials subject to applicable law.

## **V. WHO DO WE SHARE PERSONAL INFORMATION WITH?**

We may disclose Personal Information you provide to us or that we collect automatically on the Website and in and through the Services with the following categories of third parties:

- Our clients;
- Service providers, such as data storage service providers, marketing service providers, and communications service providers. Such service providers are only allowed to use Personal Information disclosed to them for the purpose of providing us the services and for no other purposes;
- Public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties; and
- Our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Website and/or the Services and their advisors in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our stock and/or assets, or in connection with bankruptcy proceedings, or other corporate reorganization, in accordance with this Privacy Notice.

## **VI. OPTING OUT OF INTEREST-BASED ADVERTISING**

Sabio works with its clients to provide ads that are likely to be more interesting and more relevant to mobile device users by automatically collecting data in connection with the Services, as described above. The best way for you to opt out of the use of Personal Information for interest-based advertising by Sabio is to follow these instructions:

### **Opt-Out Instructions:**

**Android:** You can reset your advertising ID at any time, right from the Ads section of the Google Settings app on your device. From the same app, you can also opt-out of targeted advertising based on the advertising ID by setting the appropriate ad tracking preference.

Android instructions on how to control device location settings can be found here: [https://support.google.com/nexus/answer/6179507?hl=en&ref\\_topic=6179522](https://support.google.com/nexus/answer/6179507?hl=en&ref_topic=6179522)

Android instructions on how to limit ad tracking on Android devices can be found here: <https://support.google.com/nexus/answer/3118621?hl=en>

**iOS:** You can opt out of targeted advertising by turning on Limit Ad Tracking in your device's settings menu (as of the date of this Privacy Policy, located at Settings > Privacy > Advertising) and by turning off Location Based iAds in your device's System Services Menu (as of the date of this Privacy Policy, located at Settings > Privacy > Location Services > System Services).

Apple instructions on how to control iOS device location settings can be found here: <https://support.apple.com/en-us/HT203033>

Apple instructions on how to limit ad tracking on iOS devices can be found here: <https://support.apple.com/en-us/HT202074>

Most mobile applications that collect precise location information also offer mechanisms to control or limit the collection and use of precise location information. Please note that while opting out limits Sabio's collection of information to serve you interest-based ads, it does not prevent you from receiving ads from Sabio or third parties, and we may still collect data in browsers or apps for non-interest based advertising purposes such as analytics and reporting, operations, and frequency capping. Opting out by the mechanisms above also doesn't affect previously collected information.

## **VII. INDIVIDUAL RIGHTS**

Where we process Personal Information, individuals are entitled to ask us for an overview of the Personal Information we have about them and also to access, correct or delete certain Personal Information.

Note that we are not legally obligated to agree to such requests in all circumstances, and in certain circumstances, agreeing to a request may be infeasible – for example, a deletion request when we are required by law to maintain the Personal Information. Please also note that we are not able to act on any of the above requests if we are not in a position to identify an individual filing such request.

Where applicable, these rights can be exercised by sending us an email through the contact details further below. Depending on where you live, you may have a right to lodge a complaint with a regulatory agency if you believe that we have violated any of the rights concerning Personal Information about you. We encourage you to first reach out to us at [privacy@sabio.inc](mailto:privacy@sabio.inc) so we have an opportunity to address your concerns directly before you do so.

## **VIII. FOR CALIFORNIA RESIDENTS**

California Civil Code Section 1798.83 permits Website(s) users who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make a request, please contact us: [privacy@sabio.inc](mailto:privacy@sabio.inc).

Furthermore, California residents have the following rights with respect to Personal Information we may have collected about them:

### **(i) Requests to Know**

You have the right to request that we disclose:

- The categories of Personal Information we have collected about you;
- The categories of Personal Information about you we have sold or disclosed for a business purpose;
- The categories of sources from which we have collected Personal Information about you;
- The business or commercial purposes for selling or collecting Personal Information about you;

- The categories of Personal Information sold or shared about you, as well as the categories of third parties to whom the Personal Information was sold, by category of Personal Information for each party to whom Personal Information was sold; and
- The specific pieces of personal information collected.

You may submit a request to know via [https://sabio.inc/personal\\_information\\_optout.php](https://sabio.inc/personal_information_optout.php). The delivery of our response may take place electronically or by mail. We are not required to respond to requests to know more than twice in a 12-month period.

**(ii) Requests to Delete**

You have the right to request that we delete any Personal Information about you that we have collected. Upon receiving a verified request to delete Personal Information, we will do so unless otherwise authorized by law. You may submit a request to delete Personal Information via [https://sabio.inc/personal\\_information\\_optout.php](https://sabio.inc/personal_information_optout.php).

**(iii) Right to Opt Out of the Sale of Personal Information**

You have a right to opt out of the sale of Personal Information. You may, at any time, direct us to not sell Personal Information about you to third parties. If you exercise your right to opt out of the sale of Personal Information about you, we will not sell Personal Information about you. Any Personal Information collected in connection with your request to opt-out of the sale of Personal Information about you will be used only to facilitate that request. You may opt out of the sale of Personal Information about you [https://sabio.inc/personal\\_information\\_optout.php](https://sabio.inc/personal_information_optout.php). You may also submit opt-out requests by emailing us at [privacy@sabio.inc](mailto:privacy@sabio.inc).

**(iv) Authorized Agents**

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney pursuant to Probate Code sections 4000-4465 may submit a request on your behalf.

**(v) Methods for Submitting Consumer Requests and Our Response to Requests**

You may submit a request for access and requests to delete Personal Information about you via:

[toll-free telephone number!!] or

[https://sabio.inc/personal\\_information\\_optout.php](https://sabio.inc/personal_information_optout.php)

Upon receipt of a request, we may ask you for additional information to verify your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose.

We will acknowledge the receipt of your request within ten (10) days of receipt. Subject to our ability to verify your identity, we will respond to your request within 45 days of receipt. In order to protect your privacy and the security of Personal Information about you, we verify your request by [description of how Sabio will verify requests to know and delete!!!!].

**(vi) Categories of Personal Information the We Have Sold in the Last 12 Months**

We have sold the following categories of Personal Information during the last 12 months:

(A) Mobile device identifiers;

(B) Commercial information, including products or services purchased, obtained, or considered, ads you have clicked or viewed, or other purchasing or consumption histories or tendencies;

(C) Internet or other electronic network activity information, including browsing history, search history, and information regarding your interaction with a web site, mobile application, or advertisement; and

(G) Geolocation data.

#### **(vii) The Right to Non-Discrimination**

You have the right not to be discriminated against for the exercise of your California privacy rights described above.

### **IX. DATA RETENTION**

We retain Personal Information about you only for as long as needed for the purposes for which it was collected.

Personal Information is only kept for as long as needed for the purposes described in this Privacy Notice and for our legitimate business purposes, after which it is scrubbed, de-identified, anonymized or obfuscated as soon as possible unless otherwise required by applicable legislation.

If you are a customer or supplier of Sabio, Sabio will retain Personal Information about you for the duration of the contractual relationship you or your company has with us and after the end of that relationship for as long as necessary to perform the purposes set out above or to comply with other legal obligations.

### **X. DATA SECURITY**

We maintain commercially reasonable risk-based security and data protection measures, which include, for example, end-to-end encryption for Personal Information in transit. We follow generally accepted industry standards to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect Personal Data, we cannot guarantee its absolute security.

### **XII. LINKS TO OTHER WEBSITES**

Our Website may contain links to other websites of interest. However, once you have used these links to leave our Website, we do not have any control over third party websites. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Notice. You should exercise caution and review the privacy notice applicable to the website in question.

### **XIII. CHILDREN**

The Website and the Services are not intended for children under the age of 16. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 16 years of age. We do not intentionally collect, sell, or process the Personal Information of individuals under 16 years of age. For more information on the acceptable use of the Website, please see our Terms of Service [https://sabio.inc/Sabio\\_tou.pdf](https://sabio.inc/Sabio_tou.pdf).

#### XIV. HOW DO WE USE COOKIES?

Some of the features on the Website and the Services require the use of "cookies" - small text files that are stored on your computer's hard drive. We use cookies to measure which pages are being accessed, and which features are most frequently used. This enables us to continuously improve the Website to meet the needs of our visitors.

The following sets out how we may use different categories of cookies and your options for managing cookie settings:

<b>Type of Cookies</b>	<b>Description</b>	<b>Managing Settings</b>
<b>Required cookies</b>	Required cookies enable you to navigate the Website and use its features. If you have chosen to identify yourself to us, we use cookies to allow us to uniquely identify you. These cookies allow us to uniquely identify you when you and to process your online transactions and requests.	Because required cookies are essential to operate the Website, there is no option to opt out of these cookies.
<b>Performance cookies</b>	These cookies collect information about how you use our Website, including which pages you go to and if they receive error messages from certain pages. These cookies do not collect information that individually identifies you. Information is only used to improve how the Website functions and performs. From time-to-time, we may engage third parties to track and analyze usage and volume statistical information relating to individuals who visit the Website. We may also utilize Flash cookies for these purposes.	To learn how to opt out of performance cookies using your browser settings, click <a href="https://www.aboutcookies.org">https://www.aboutcookies.org</a> . To learn how to manage privacy and storage settings for Flash cookies, <a href="#">click here</a> .
<b>Functionality cookies</b>	Functionality cookies allow our Website to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of the Website after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. We may use local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on the Site to personalize your visit.	To learn how to opt out of functionality cookies using your browser settings, click <a href="https://www.aboutcookies.org">https://www.aboutcookies.org</a> . To learn how to manage privacy and storage settings for Flash cookies, <a href="#">click here</a> .
<b>Targeting or Advertising cookies</b>	From time-to-time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit the Website. We sometimes use cookies delivered by third parties to track the performance of our advertisements. For example, these cookies remember which browsers have visited the	To learn more about these and other advertising networks and their opt out instructions, <a href="#">click here</a> . To learn how to manage privacy and storage settings for Flash cookies, <a href="#">click here</a> .

	<p>Website. By way of example, as you browse the Website, advertising cookies may be placed on your computer so that we can understand what you are interested in. Our advertising partners then enable us to present you with retargeted advertising on other sites based on your previous interaction with the Website. Third parties, with whom we partner to provide certain features on the Website or to display advertising based upon your web browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.</p>	
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**XVI. CHANGES TO THE PRIVACY NOTICE**

This Privacy Notice may change from time to time, effective from the date mentioned in the updated version of the Privacy Notice. Please check the Website periodically to review such changes in the Privacy Notice. We may email periodic reminders of our agreements and policies in the event of a change.

**XVII. CONTACT US**

If you have any questions or concerns about this Privacy Notice or about Sabio's privacy or data security practices, please contact us via the following:

[privacy@sabio.inc](mailto:privacy@sabio.inc)

Toll Free : +1.844.974.2662

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