



Privacy Policy

April 07, 2021

Introduction

This privacy policy (“Privacy Policy”) describes the collection of personal information by Quboapp. (“Company,” “we,” “us”, or “our”) from users (“you”, “your”) when using the services available on this and other websites we operate, and when using our mobile and desktop applications (collectively, the “Service” and “Services”). This Privacy Policy also describes our use and disclosure of such information. This Privacy Policy is incorporated by reference into our Terms of Use.

For the purposes of EU data protection laws ("**Data Protection Legislation**"), Quboapp is a data controller (i.e., the company that is responsible for, and controls the processing of, your personal information).

What is the purpose of this Privacy Policy?

This Privacy Policy discloses our personal information gathering and dissemination practices with respect to the Services. Please read this Privacy Policy carefully to understand our views and practices regarding your personal information and how we will

treat it. By visiting and/or using the Services, you are accepting the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services.

Contacting us

If you have any questions or comments about this Privacy Policy, you may contact us by email at info@quboapp.com

What information do we collect?

This section describes the types of personal information we may collect about you. We use the personal information we collect to carry out our obligations arising from any contracts entered into between you and us and to provide you with the Services that you request from us.

Information you provide us directly

Contact and account information. We may collect personal information, such as your name, phone number, address, industry type, company, and e-mail address when you register for our Services, purchase products, sign up for our mailing lists, or otherwise communicate with us.

Online Inquiries and Correspondence. You may submit an inquiry via the Service, or via email or written mail. For example, when requested Customer Support services, when requesting additional information about our products and the Service, and any other general correspondence. We may ask for your first and last name, physical address, email address, phone number, company name, industry type, details about your current product

usage, and certain other information from time to time. You should ensure that you do not include any personal information beyond what we have requested in any online inquiries or correspondence.

Images stored and processed. When you capture images using Quboapp services or other devices, or if you provide images from any other source and upload them to the Quboapp servers, we may collect personal information which is depicted within the imagery you submit.

Automatically collected information

URL, IP addresses, Device Information and Frequency of Use. Like many other online service providers, we collect and analyze information about our users' utilization and navigation of our Services. This information helps us to design our Services to better suit our users' needs, and we also use this information to share aggregated, anonymous information on the effectiveness of our Services with content owners and creators. This information is collected automatically and may include the URL you came from prior to using the Services, the Internet Protocol address (IP address) of your computer or mobile device, the type, and version of the internet browser you are using, the make, OS model and unique identifier of your computer or mobile device, and your usage patterns associated with the Services.

Location data. When you use Quboapp services in conjunction with our mobile applications your current location may be captured and processed from location information provided from mobile devices built-in GPS sensors, and from information derived from cell tower triangulation. Additionally, we may use your IP address information to determine your approximate location. The mobile device OS will always prompt you for permission to use location data and we do not bypass this OS provided permission functionality in our mobile applications.

Information from other sources

We may receive information about you, including personal information, from third parties, and may combine this information with other personal information we maintain about you. If we do so, this Privacy Policy governs any combined information that we maintain in a personally-identifiable format.

Cookies and similar technologies

Cookies are small files that are stored on your computer or mobile devices by saving your information such as user ID and other preferences. Cookies are either deleted from your computer or mobile device at the end of every session or are maintained for a longer period of time. As a result, we use cookies to distinguish you from other users of our Service and this helps us to provide you with a personalized experience when you use the Services, and also allows us to better understand how you use the Services. For example, we use cookies to protect your account. We also use cookies for analytical purposes to better understand how you use the Services and to deliver the best user experience.

Also, please be aware that third parties' sites ("Third-Party Sites") that may be linked to from the Service, may set cookies or use other means of passively collecting information about your use of their services, Third-Party Sites or content. We do not have access to, or control over, these third-party means of passive data collection.

Collection and processing of sensitive information

The Service does not collect or process 'sensitive information', defined as data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health

or data concerning a natural person's sex life or sexual orientation. As such, you should not provide any such information as part of your user profile, as part of any correspondence, when you upload images, or by any other means with your use of the Service.

How do we use personal information?

Contact and account information. We use your contact and account information to enable us to provide a secure and personalized Service. We also use your personal information to improve our services, to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about, or to notify you about changes to our Services.

Payment and transaction information. We use this information to facilitate transactions, detect and prevent fraud and keep a record of your purchases so we can provide you Customer Support and warranty services, and for financial purposes as required by law. We do not process your credit card information directly, but rather this information is processed by one or more 3rd-party payment processors.

Online Inquiries and Correspondence. We use the personal information you provide so we may communicate with you regarding your inquiry and to satisfy other requests. If you provide your phone number, we may use that information to make direct dial calls, autodialed and prerecorded message calls, and to send text messages, from Quboapp relating to our products and services. If you correspond with us via email or by written mail, we may store the information you submit in a manner specific to

you, for example in an electronic file indicating you are the sender.

Images stored and processed. We use the images you upload to Quboapp servers to provide the Services you have subscribed to. Additionally, we use this information in an aggregated form for analytics and machine learning, but the results of these activities do not contain or disclose any personal information that is identifiable to you. If you captured personal information in images that you have uploaded to Quboapp servers this information may be publicly displayed if you choose to display the underlying imagery publicly through the Service. If you do not wish to publicly display personal information depicted in the images you submit, you should either refrain from capturing such personal information in your images. You are responsible for any personal information depicted in the imagery, and you should refrain from capturing any personal information if you object to the processing as described in this Privacy Policy.

URL, IP addresses, Device Information and Frequency of Use. We use this personal information to better understand how frequently you use the Services, the time you spend actively using the Services, and the pattern of actions you take in using the Services, We also track the URL that you visited before you came to our Services, the URL to which you next go to, information about the browser through which you are accessing the Services, and your Internet Protocol (IP) address. We use this information to administer and improve our Services, help diagnose problems with our Services, and to better understand your use of the Services. Your IP address may also be used to help identify you and to gather broad location and demographic information.

Location data. We may use location data to autofill the address of a location being scanned when using the Service. We also may use location data to assist the processing of image data and to better understand how multiple scan locations are related to each

other. We also may use location data to provide aggregated analytics to better understand how and where the Service is being used, to provide a customized and localized experience when using the Service, and to prevent access to the Services where required by law.

Legal basis for processing in the EU

If you are a resident in the EU, we need to tell you the legal basis on which we collect and use your personal information. In the EU, the purposes for which we process your personal data are:

- Where we need to perform the contract we are about to enter into or have entered into with you for the Service;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation in the EU.

The legal basis depends on the category of personal data being processed, and the purpose for that processing. The following table indicates each category of personal data we process, and the legal bases we rely on to do so. Where legitimate interest has been used as the legal basis for processing, the specific legitimate interest we use has been described. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where one or more legal bases has been indicated.

Category of Personal Data

Legal Basis for Processing

Contact and account information	The performance of a contract and to take steps prior to entering into a contract; Our legitimate interests, namely, administering the Service, for marketing purposes and communicating with users.
Payment and transaction information.	Performance of a contract; Our legitimate interests, namely providing Customer Support and the detection and prevention of fraud.
Online Inquiries and Correspondence	Legitimate interest, namely for marketing purposes and to respond to inquiries
Images stored and processed	Performance of a contract;
URL, IP addresses, Device Information and Frequency of Use	Our legitimate interests, namely providing, administering and improving the Service
Location data	Our legitimate interests, namely providing, administering and improving the Service

When do we share your personal information?

Quboapp will not share, rent, sell or otherwise disclose any of the personal information that we collect about you, except when we have your permission or in any of the following situations:

We disclose information that we collect about you to our third-party contractors, service providers, and processors who perform services for Quboapp in connection with the Services and/or our business or to complete or confirm a transaction that you conduct with us. Unless you request otherwise, we require these contractors to use or disclose this information only as necessary

to perform services on our behalf in a manner consistent with this Privacy Policy, or as otherwise required by law.

We may disclose the results of aggregated data about you for marketing or promotional purposes, as further described below. We may disclose, to the owners of certain content available through the Services, or their representatives, the following types of aggregated data about usage of such content: the number of views and the number of users who view the content, statistical information about users who view the content by geography, the referring URLs of users who view the content, the number of users who interacted with the content in specific ways, and other similar aggregated information relating to usage of the content. We may also disclose to third parties certain algorithms developed from analytics and machine learning conducted on user information collected in aggregated form, but these algorithms do not contain or disclose any personal information that is identifiable to you.

We may disclose your personal information to partners and resellers in order to facilitate sales in situations where Quboapp does not directly sell our products and Services due to location, industry type or any other reason as determined solely by Quboapp.

We may disclose information about you as part of a bankruptcy, corporate reorganization, merger, acquisition or other sale or transfer of Quboapp's assets or business.

We may be legally obligated to disclose information about you to the government or to third parties under certain circumstances, such as in connection with illegal activity related to our Services or to respond to a subpoena, court order or other legal process, including to meet national security requirements. We reserve the right to release information that we collect to law enforcement or other government officials, as we, in our sole and absolute discretion, deem necessary or appropriate.

Direct marketing

From time to time, we may contact you with information about our products and services. Most marketing messages we send will be by email. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you. In most cases our processing of your personal data for marketing purposes is based on our legitimate interest to provide you information about our current and future products, services and events.

If you do not want to receive marketing messages from us, you will be able to tell us by selecting certain boxes on forms we use when we first collect your contact details. If you receive marketing email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving marketing email from us, and any other promotional communications that we may send to you from time to time (e.g., by postal mail) by sending your request to us by email at info@quboapp.com.

Please be aware that if you opt-out of receiving marketing email from us, it may take up to ten business days for us to process your opt-out request, and you may receive marketing email from us during that period. Additionally, even after you opt-out from receiving marketing messages from us, you will continue to receive administrative and transactional messages from us regarding your use of the Service.

Where do we process your personal information?

- International Transfers of your personal information. As we are primarily located in EU, any information you provide will initially be collected processed and stored in EU.
- Privacy Shield. We comply with the EU-U.S. Privacy Shield and Swiss-U.S. privacy framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information received from European Union countries and Switzerland (the "Privacy Shield"). We have certified that we adhere to the Privacy Principles of notice, choice and accountability for onward transfer, security, data integrity, purpose limitation, access, and recourse, enforcement and liability ("Principles"). If there is any conflict between the policies in this Privacy Policy and the Privacy Shield Principles, the Principles shall govern. In cases of onward transfers of data received pursuant to the EU-U.S. and Swiss-U.S. Privacy Shield, we are potentially liable. To learn more about Privacy Shield, please visit the U.S. Department of Commerce Privacy Shield website: <https://www.privacyshield.gov/>. For more information regarding our Privacy Shield certification, please see: <https://www.privacyshield.gov/list>.
- If you wish to enquire further about the safeguards we use, please contact us using the details in the 'Contacting us' section of this Privacy Policy.

- We will take reasonable steps to ensure that your personal information is treated securely and in accordance with applicable law and this Privacy Policy.

Jurisdiction and Enforcement

- As part of our participation in the Privacy Shield, we are subject to the investigatory and enforcement powers of the US Federal Trade Commission ("FTC").
- For European Union residents, you also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.
- In compliance with the EU-US and Swiss-US Privacy Shield Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Privacy Policy should first contact us using the contact information listed below.
- We have further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism. Under certain conditions specified by the Principles, you may also be able to invoke binding arbitration to resolve your complaint. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit JAMS at <https://www.jamsadr.com/eu-us-privacy-shield> for more information and to file a complaint.

How do we may use online analytics services and tailored online marketing?

In our Services, we may use Google Analytics and other third-party web analytics services. These third-party services may use the kinds of technology described in the preceding sections to help us analyze how users use the Services, including by noting the URL that users visited before they came to our Services. These service providers will receive or directly collect the information collected by the technology, which they will use to evaluate your use of the Services. As described in the following paragraphs, we also use Google Analytics with the Services for certain purposes related to online marketing. You may wish to install the Google Analytics Opt-Out Browser Add-on, available at: <https://tools.google.com/dlpage/gaoptout>, to prevent Google Analytics from using your information for analytics.

We also allow other third parties, such as Google Analytics, Facebook and other ad networks and ad servers, to access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use the Services. These tracking technologies enable these third parties to serve our tailored marketing to you while viewing other areas of the Internet, based on anonymous information collected while you are using the Services. We have implemented the following Google Analytics advertising features based on interests and location for the purposes of remarketing: retargeting and enhanced demographic tracking, including affinity audiences, custom affinity

audiences, in-market audiences, similar audiences, demographic and location targeting, and demographics and interest reports. The parties that provide these technologies may offer you a way to opt out of targeted marketing as described below. Click the following link for more information on how Google uses data when you use the Site: <https://policies.google.com/privacy>

You may visit the Network Advertising Initiative's Consumer Opt-Out Link and/or the Digital Advertising Alliance's Consumer Opt-Out Link to opt-out of receiving tailored marketing from companies that participate in those programs, and if you are interested in learning about tailored browser marketing and how you can generally control cookies from being put on your computer to deliver tailored marketing (i.e., not just for our Site). You may also visit the Google Ads Settings page to opt-out of Google Analytics for Display Advertising or customize Google Display Network ads. Please also see additional information here about Google Ad Settings for mobile apps. Be aware that you may still receive marketing content that is not tailored to your interests, even if you opt-out of tailored marketing, to the extent marketing technology is integrated into our Site. In addition, we are not responsible for any choices you make using any of the above opt-out links, and we do not control these opt-out methods or their continued availability or accuracy.

You may also receive tailored in-application marketing content when using an application on a mobile device. Each mobile operating system provides its own instructions on how to prevent or opt-out of the delivery of tailored in-application marketing content.

EU privacy rights

If you are located in the EU, you have the following rights in respect of your personal data that we hold:

- **Right of access.** You have the right to access the personal information that we hold about you.
- **Right to rectification.** You may have the right to require us to correct any inaccurate or incomplete personal information we hold about you.
- **Right to erasure.** In certain circumstances you may have the right to the erasure of your personal data we hold about you (for example where it is no longer necessary in relation to the purposes for which it was collected or processed).
- **Right to restriction.** You may have the right to request that we restrict processing of your personal information in certain circumstances (for example where the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of that personal data).
- **Right to portability.** In some limited circumstances, you may have the right to portability which allows you to move, copy or transfer personal data from one organization to another.
- **Right to object.** You have a right to object to us processing your personal information when the processing is based on legitimate interests and also to stop us sending you direct marketing.
- **Rights in relation to automated decision making and profiling.** You have the right not to be subject to a decision that affects you based solely on automated processing. See

the section ‘Automated Decision-making’ in this Privacy Policy for more information.

If you wish to exercise one of these rights, please contact us using the information in the ‘Contacting us’ section of this Privacy Policy.

Automated decision-making and profiling

Automated decision making refers to a decision that is taken solely on the basis of automated processing of your personal data, for example using software, artificial intelligence or other rating or scoring algorithms. Profiling uses automated processing which sometimes results in automated decision making, and in some cases does not.

When you sign up to use the Services, we may use certain personal information, for example your first name, last name, address and IP address to verify you are eligible to use the Services and to restrict your access if you are not, for example if you are resident in a country or region that is subject to a U.S. government embargo. We will also restrict access by use of automated decision-making and profiling to anyone on or, directly or indirectly, owned, in whole or part, by any person or persons on the U.S. Treasury Department’s List of Specially Designated Nationals and Blocked Persons or any other U.S. government list of parties with respect to transactions that are forbidden or restricted.

You have the right to not be subject to decision making which is solely based on automated processing and profiling, but only when that decision results in legal effects or otherwise significantly affects you. If you believe we have incorrectly made a

decision based on automated decision-making and profiling, please contact us using the information in the 'Contacting us' section of this Privacy Policy.

Your right not to be subject to automated decision making and profiling does not apply if the decision was necessary for entering into or performing a contract with you or is authorized by law and there are suitable safeguards for your rights and freedoms. However, in these situations, you can still obtain human intervention in the decision-making process and will make sure there are methods in place for you to express your point of view.

How do we secure your personal information?

We take steps to help protect your data, including your personal information. The steps include protecting this data against accidental loss, unauthorized use, disclosure, and restricting access to personal information by our staff. The Service is hosted by a third-party hosting company. We also require all staff that administer and develop the service follow a series of controls, including strong passwords, the use of anti-virus and anti-malware software, disk encryption and other practices.

We use various 3rd party processors to enable us to provide the Service, and as part of our vendor due-diligence, we review the security controls these processors have in place for appropriateness in relation to the type of data we collect.

You should keep in mind, however, that the Service utilizes software, hardware, and networks, which from time to time require maintenance and experience problems beyond our control. Note that no data transmission over the public internet or encryption method can be guaranteed to be 100% secure.

Consequently, we cannot ensure or warrant the security of any information that you provide to us. You transmit information to us at your own risk.

How long do you retain personal information?

Unless otherwise specifically stated elsewhere in this Privacy Policy, we will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Rights to access

You may correct or update information collected about you by contacting Quboapp at the email or mailing address noted below. We will use commercially reasonable efforts to correct or update our records. For our records, we may retain original and updated information for reasons such as technical constraints, dispute resolution, troubleshooting, and agreement enforcement.

You have the right to access personal information about you. We may request a fee to meet our costs in providing you with details of the information we hold about you, as permitted by law. We may decline to process requests that are frivolous, vexatious, jeopardize the privacy of others, are extremely impractical, or not otherwise required by local law.

Links to third-party websites, apps or services?

This Privacy Policy only addresses the use and disclosure of personal information collected from you by Quboapp. You should be aware that when you are using the Services, you may also use or be directed to other websites, applications or services of third parties that are beyond our control, and Quboapp is not responsible for the privacy practices of third parties or the content of their websites, applications or services. We encourage you to read the posted privacy policy whenever interacting with any third party website, application or service.

Updates to this Policy

We may occasionally update this Policy. When we do, we will also revise the “last updated” date at the beginning of the Policy. Your continued use of our Service after such changes will be subject to the then-current policy. If we change this Policy in a manner that is material, we will use reasonable efforts to notify you via the contact methods you have provided of the change prior to applying the change to any personal information that we collected from you prior to the date the change becomes effective. We encourage you to periodically review this Privacy Policy to stay informed about how we collect, use, and disclose personal information.

What is our policy on children users of the Services?

We do not knowingly collect or maintain personal information from persons under 18 years old. Our Services are intended for use by a general audience, and no part of our Services is directed to children under 18. If Quboapp learns that personal information of children less than 18 years old has been collected without verifiable parental consent, then Quboapp will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under the age of 18 has obtained an account on the Services or otherwise provided us with personal information without your consent, then you may alert Quboapp at the address below and request that we delete that child's personal information from our systems.