

## Pobo Apps Privacy Policy

This Privacy Policy ("Policy") of Pobo Page Builder s.r.o. ("Page Builder", "we", "us", or "our") addresses how we handle the personal information we collect via Page Builder s.r.o. branded websites, mobile and web based applications available and downloaded from our network, chat and support functions, social media, and email in connection with our business development efforts, marketing programs, surveys, offers, events and other promotions (individually, a "site" and collectively, "sites"). We also collect personal information that is provided by persons or entities who sign up for and subscribe to our platform, including store owners and their authorized personnel and representatives ("Customer") in order to receive our services ("Services") and from our Customer's user/customer that signs up with our Customer ("End User").

We may obtain this personal information directly from you as well as from our affiliated companies, business partners and other third parties. This Policy describes (i) how we collect and use personal information we collect from or about you through our site, use of the Services and in connection with our Customer, partner and third party service provider relationships, (ii) your rights and choices with respect to your personal information, and (iii) how you can contact us if you have any questions or concerns. If you are located in a jurisdiction with data protection laws that offer you privacy rights not described in this Privacy Policy, please contact us at [info@pobo.space](mailto:info@pobo.space). We respect your privacy rights and will do our best to accommodate your written requests.

When we process personal information provided by our Customers using our Services, we process such personal information as a data processor on behalf of and following instructions from our Customer. To understand how our Customer processes your personal information, please refer to that Customer's privacy policy.

Please read this Policy carefully. If you do not agree with this Policy or any part thereof, you should not access or use any part of the Services, or otherwise provide us with your personal

information. If you change your mind in the future, you should stop using the Services and provide us with no further personal information.

All personal information voluntarily provided to us are collected, processed and used in accordance with applicable privacy laws and regulations, especially General Data Protection Regulation (regulation in EU law on data protection and privacy in the European Union and the European Economic Area, hereinafter referred to as "GDPR"). Privacy Policy covers data collection and processing carried out by the Company. The Company is not responsible for the privacy practices of any other third parties.

This Privacy Policy, together with the Terms of Service and any other documents provided to you by Page Builder, form an integral part of the agreement between you and Page Builder.

## Information We Collect or Process

Your personal information are collected and processed by Page Builder s.r.o., reg. no. 106 96 997, a limited liability company with registered office in Prague, Czech Republic.

We collect and process personal information on legal basis hereunder:

- contractual obligations entered by you and us,
- your explicit consent given to specific purposes,
- compliance with legal obligations,
- legitimate interest of us or third parties.

You may choose to provide personal information to us in a number of ways, such as when you participate in an offer or promotion, when you make a purchase on our sites, visit our social media pages or use our Services. For instance, the personal information you may provide to us and how it may be provided includes the following:

- If you register to use the Services as a Customer, then you will provide us with your name, business contact information, title, office address, email address, telephone number(s), device type, and a password in order to create an account, along with signature information (including timestamp);

- If you are using the Services as an End User of a Customer, we collect information about End Users from their use of the Services, including the content of their text messages. The information we collect, some of which is personal information, includes: mobile telephone numbers and IP addresses;
- If you are not a Customer or End User, you are considered a visitor to our sites, during which time we may collect information you provide by interacting with us through our sites, including by submitting questions, commenting on our forums and interacting with us through social media;
- When you communicate with us via the Services, or you send us a request of any type, we collect personal information, such as your name, email address, physical address, IP address, city, region, country, Zip code, telephone number, and the contents of your correspondence with us, including technical support requests, and feedback on your use of the Services. In order to respond to you in a more efficient way, we may use chatbot or similar technics and tools to support you. If you choose to interact with such technics and tools, you agree that we will process your personal information provided by you during your interaction with such technics and tools in accordance with this Privacy Policy, the personal information of which may include your preferences, IP address, your interests, and the problems you want to solve, as the case may be;
- When you use the Services, you provide us with information such as your device information, including model, manufacturer and brand (but specifically excluding IMEI or device UUID), user ID, channel mode, SDK version, network type, App ID, call information, quality of services information (including network quality metrics), and device status changes;
- Information provided through social media networks or one of our mobile applications when you visit our social media pages (such as your name, profile picture, likes, location, friend list and other information described on the social media network or your geo-location details when using one of our mobile applications);

- To complete your purchase of our Services (Page Builder s.r.o. does not collect and store your complete credit card information. Your credit card payments are processed by a third-party credit card processing service); and
- If you submit any personal information relating to other people to us or to our service providers in connection with the services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

When you visit our sites, view or click on our online advertisements (including our advertisements on third party websites), visit our social media pages or use our Services, we also collect certain information about your usage or device by automated means or by using technologies such as cookies, web server logs and web beacons. As set forth in more detail below, we may also collect information about your usage and browsing habits using various web-based technologies. The information we may collect automatically includes:

- Usage information. Whenever you visit or interact with our sites, we, as well as any third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how our sites are accessed and used ("Usage information"). Usage information may include browser type, device type, operating system, application version, the page served, the time, the preceding page views, and your use of features or applications on our sites, as well as search terms that visitors use to reach our sites. This information helps us keep our sites usable for our visitors and allows us to tailor content to a visitor's interests.
- Device Identifier. We automatically collect your IP address or other unique identifier ("Device Identifier") for the Device (computer, mobile phone, tablet or other device) you use to access our sites. A Device Identifier is a number that is assigned to your Device when you access a website or its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer our sites, help diagnose problems with our servers, analyze trends, track users' web page movements, help identify you and your interests, and gather broad demographic information for aggregate use.

- Cookies; Pixel Tags. We and third parties may automatically collect information about your visit to and use of the Services via cookies. The information they collect may include personal information, such as your IP address, and advertising identifiers. The technologies used on our sites to collect Usage information, including Device Identifiers, include but are not limited to: cookies (data files placed on a Device when it is used to visit our sites), mobile analytics software and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed). Cookies may also be used to associate you with social networking sites like Facebook, Instagram, LinkedIn, Twitter and, if you so choose, enable interaction between your activities on our sites and your activities on such social networking sites. We, or our partners, may place cookies or similar files on your Device for security purposes, to facilitate site navigation, to perform analytics, and personalize your experience while visiting our sites (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location or demographic information). A pixel tag may tell your browser to get content from another server.
- Our website uses its own functional cookies which are necessary for the efficient functionality of the website (1st party cookies). The website itself informs you about the use of cookies on your device as soon as you enter it for the first time. In addition to that, the website asks you for your consent with another 1st, as well as 3rd party cookies used for different purpose than sole functionality of the website. These cookies will be stored in your browser only with your previous consent.
- To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser's cookie folder, or prevent tracking activities, please refer to your browser's tools or help menu or other instructions related to your browser. Because an industry-standard Do-Not-Track protocol has not yet been established, our information collection practices on our sites will continue to operate as described in this online privacy policy regardless of

any “Do Not Track” signals that may be sent by certain browsers. However, you may refuse to accept cookies in order to prevent tracking activities. If you disable or opt out of receiving cookies, please be aware that some features and services on our sites may not work properly because we may not be able to recognize and associate you with your account. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

- We may use third-party website analytics tools that collect automated information about visitor traffic on our sites, such as Google Analytics. You can learn how Google collects and processes data by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) .

## How We Use the Information We Collect

We use the information we collect for a variety of business purposes including: complete your subscription for the Services, respond to your correspondence and requests, obtain your feedback regarding our sites or Services, send you information and updates about our sites or Services, confirm a Customer’s identity and associate an authorized representative or End User with a Customer’s account, confirm an End User’s identity, monitor and enforce compliance with our Terms, Acceptable Use Policy or other agreements.

We may use the information for other purposes such as customer support for our Services and to troubleshoot problems, customize your experience with our Services, communicate with you, promote our Services, such as through targeted advertising, and learn how users interact with our sites and Services so that we can improve our Services and develop new features; communicate with you about your account and activities on our sites, modify or change any of our policies; tailor content, advertisements, and offers we serve you; improve our sites; comply with contractual obligations; and for purposes disclosed at the time you provide your personal information or otherwise with your consent. We may also collect information for purposes such as:

- Communicate with you (including by phone or by email) about our products, services, offers, surveys, events and promotions, and offer products and services we believe may be of interest to you;
- Publish your testimonials about Page Builder s.r.o., including on our sites, forums, blogs, and social media assets (if we choose to publish your testimonial, we will generally only include your name, title and company name);
- Follow up with individuals and companies with whom you have shared Pobo (Page Builder s.r.o.) content;
- Analyze and enhance our marketing communications and lead generation strategies (including by identifying when emails sent to you have been received and read);
- Analyze trends and statistics regarding visitors' use of our sites;
- Protect against fraud and unauthorized transactions;
- For billing purposes; and
- To detect and block fraudulent use of the sites and Services.

We may combine the information we collect with publicly available information and information we receive from our affiliated companies, business partners and other third parties. We may use that combined information for the purposes described in this Policy. On our sites, we may collect information about your online activities to provide advertising about products and services tailored to your individual interests. You may see certain ads on our sites and other sites because we participate in advertising networks. Ad networks allow us to target our advertising to users through demographic, behavioral and contextual means. These networks may track your online activities over time and across third-party websites or online services, including by collecting information through automated means through the use of cookies, web server logs, web beacons and other methods. These networks may place cookies, web beacons or similar tracking devices while you are visiting our sites or other sites. The networks use this information to show you advertisements for Page Builder s.r.o. and our business partners that are tailored to your individual interests. They may also use the information they collect for their own purposes. The information our ad network vendors

collect includes information about your visits to websites that participate in the vendors' advertising networks, such as the pages or advertisements you have viewed, and the actions you take on the sites. This data collection and ad targeting take place both on our sites and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

## Information We Share

We do not sell, rent, or otherwise disclose personal information about you, except as described in this Policy. We may share non-personal information, such as aggregate data and Usage information with third parties. We may share the information we collect with our affiliated companies, business partners, ad network vendors and their participants, and other third parties for the purposes described in this Policy, including to communicate with you about products and services, offers, events and promotions that we believe may be of interest to you. We may also share the information with our service providers that perform services on our behalf. We do not authorize these service providers to use or disclose the information except as necessary to perform certain services on our behalf or comply with legal requirements. We also may share information about you with other third parties. We will ask for your permission prior to sharing information about you with other third parties.

While on our sites, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else or to otherwise consent to the sharing of your information with a third party, including social networking sites. If you agree to have your personal information shared, your personal information will be disclosed to the third party and the personal information you disclose will be subject to the privacy policy and business practices of that third party. We may share your personal information with other entities and our affiliates primarily for business and operational purposes such as Network operators (e.g., telecommunication providers) for security, spam and fraud protection or to provide telecommunications network access, and other vendors that help us provide the Services



and sites, such as payment card processors, auditors and customer engagement platform, data security and cloud service providers etc.

In the event that we are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction and any potential acquirers and their professional advisers in connection with any proposed purchase, merger or acquisition of all or any part of our business. We will inform the buyer that the terms of this Privacy Policy apply to your personal information. We may transfer and disclose your information to third parties to comply with a legal obligation; when we believe in good faith that the law or a governmental authority requires it; to verify or enforce our terms and conditions or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect our rights or property or security of third parties, visitors to our sites or the public.

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at [info@pobo.space](mailto:info@pobo.space).

## **Your Privacy Rights, Choice and Access**

We offer you certain choices about what information we collect from you, how we use and disclose the information, and how we communicate with you.

You control the personal information that you provide to us on our sites, but some personal information is required by us in order for you to obtain services from us or for you to use our sites. If you choose not to provide us with your personal information on our sites, you may not be able to take advantage of some of the services we offer or use some functionality on our sites. Except as provided above, we will not share personal information collected on our sites with third parties without your consent. You may also direct us to stop sending you promotional emails by following the removal instructions in a communication you receive from us. Your opt-out request will be processed within a reasonable period of time following

the date on which we receive it. We ask that you not send us, and you not disclose, any sensitive personal information (e.g., Social Security numbers, health, biometrics or genetic characteristics or other criminal background) on or through the Services or otherwise to us.

If you wish to modify, verify, correct, or delete any of your personal information collected through our sites, you may edit your registered user information or contact us at [info@pobo.space](mailto:info@pobo.space). In accordance with our routine record keeping, we may delete certain records that contain personal information you have submitted through our sites. We are under no obligation to store such personal information indefinitely and disclaim any liability arising out of, or related to, the destruction of such personal information. We will retain your information (including geo-location data) for as long as your account is active or as needed to provide you services. If you wish to cancel your online account or request that we no longer use your information to provide you services through the platform, please contact us at [info@pobo.space](mailto:info@pobo.space). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We do not control certain privacy settings and preferences maintained by our social media partners. If you wish to make changes to those settings and preferences, you may do so by visiting the settings page of the appropriate social media site.

If you believe your personal information has been used in a manner not consistent with the policies outlined, please contact us using the information provided below.

## **How We Protect Your Personal Information**

We use technical, physical and administrative safeguards intended to protect the personal information that we collect from and about you. Our safeguards are designed to provide a level of security appropriate to the risk of processing your personal information and include (as applicable) measures to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and a procedure for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing of personal information.

We use solutions provided by EU/EEA based companies, as well as US based companies, to store your data. US companies are required to provide equivalent level of protection for personal data of their EU based data subjects to the protection guaranteed by GDPR.

You are responsible for maintaining the security of your account credentials for the Services. Page Builder s.r.o. will treat access to the Services through your account credentials as authorized by you. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately at [info@pobo.space](mailto:info@pobo.space).

If we become aware of a breach that affects the security of your personal information, we will provide you or the Customer with notice as required by applicable law. When permitted by applicable law, Page Builder s.r.o. will provide this notice to you through the email address associated with your Page Builder s.r.o. account.

## Your Right Related to Personal Information

Under the GDPR, you are granted certain rights related to the processing of our personal data. We are obliged to use, collect and process personal data in such a way that you and other persons do not suffer harm to your rights.

You have the right to request information about processing of his personal data and to request a copy of such personal data. If personal data are processed in fully automated manner and are kept in a structured machine-readable format, the you are entitled to request a copy of such data in the same machine-readable format. You also have the right to request transfer of your data to another administrator, if technically possible.

If your personal data is inaccurate, you have the right to have the data rectified, by us, without undue delay. If your personal data is incomplete, you have the right to have data completed, including by means of providing supplementary information. Invoice details cannot be changed in accordance with the applicable legislation. Such data can only be changed if the user has not yet received or paid for the goods or services.

You are entitled to object to processing of your personal data if it is inaccurate, no longer necessary or are processed illegally. You will be informed of the assessment of the objection. In this case, we can only process your personal data with your consent (except for the saving or backup of these personal data).

If you wish to file a complaint in regard to the processing of your personal data, you might contact us at [info@pobo.space](mailto:info@pobo.space). We will resolve objections and other inquiries related to data processing within one (1) month and inform you how we solved your request.

You also have the right to lodge a complaint with our supervisory authority seated in the Czech Republic, Prague (the country and city of the Company residence) - The Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague, Czech Republic.

If any problem related to you privacy or data protection occurs, please always contact us first and we will gladly try to solve such problem towards your satisfaction.