

## **SCYBOT TECHNOLOGIES LLC**

### **PRIVACY POLICY**

At Scybot Technologies LLC, we are committed to providing you with high-quality services and to respecting your privacy. Since a major target population in regards to our services is children, (persons below the age of majority) this privacy policy is both GDPR and COPPA compliant. This Privacy Policy describes our policies and procedures on collecting, using, and disclosing your information when you use our websites, programs or services.

#### **1. GENERAL**

1.1. Please read this privacy policy carefully before using [www.scybot.com](http://www.scybot.com) and associated mobile apps.

1.2. This policy has been construed and shall be interpreted in accordance to the laws of the State of Utah.

#### **1.3. Definitions**

“We,” “Us”, “Our”, “Company” shall refer to Scybot Technologies LLC, our subsidiaries and affiliates, and any of our respective agents and third-party service providers (“service providers”).

“You” means the individual accessing or using the Service, or the Company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## **2. COLLECTION OF INFORMATION**

**2.1.**We may collect your personal information to maximize high-quality service delivery to you, provide you with any additional or special information about our services, and protect your account and personal information.

**2.2.**We may collect the following kinds of information when you, or other users access the Service:

- your contact information, such as full name and email address;
- The Content, communications, and other information you provide when you use Our Service. This can include information in or about the Content you provide;
- user communications, feedback, suggestions, and ideas sent to you;
- Information that you provide when you engage platform support regarding the Service.

You represent and warrant that you have sought the consent of any individual whose information you provide to us.

**2.3.**We may collect personal information about you from the information you provide to us when you fill out an Application or other forms on our site. We may also collect personal information from individuals whose identity you share with us.

**2.4.**Our servers also collect information from you, such as your domain name, websites you visit, and Internet Protocol address. This information is not personally

identifiable. However, when you respond to questions or communicate with us, your personal information may be collected.

### **3. USE OF INFORMATION**

3.1. Where it is in our legitimate interest to do so, We may use your personal information to:

- To effectively manage Your Account: to manage Your registration as a user of the Our services;
- To provide you with details about our products and services by email, text, phone and/or through other communication methods;
- carry out financial and identity checks, fraud prevention checks, regulatory checks, and credit checks;
- to carry out product development, statistical analysis, and market research;
- to develop and improve our services ;
- to update our records;
- to carry out checks required by applicable regulation or regulatory guidance;
- to improve our relationship with you by making the website available to you in a user-friendly way, and to identify services you may be interested in;

- for customer service, including answering questions and responding to feedback and complaints;
- for any other specific purposes in relation to your activities via the Platform;
- Where you have given us consent, we shall provide you with information about any new services, promotions, and other information that we think will be of interest to you. You can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences by contacting us via the details given in the "Contact Us" section below.

3.2. We may use your email address to communicate with you. Upon your consent, we may direct electronic email communication to you about our services or market new services. We may also ask to seek your feedback on the services we offer. You have an option to opt-out of such electronic communication. Lastly, we may track your email activity to check the effectiveness of the communication.

#### **4. SHARING PERSONAL INFORMATION**

1. We won't provide your personal information to other companies for their marketing purposes unless you have given us your consent. However, we may aggregate anonymous information based on your personal information and disclose this to advertisers and other third parties.

2. We may disclose your personal information to third parties where it is in our legitimate interest to do so, including the following reasons:

- we may share your information with analytics and search engine providers that assist us in the improvement and optimization of our site;
- we may share your personal information with companies and other third parties performing services on our behalf (for example, customer relationship management providers, or other service providers) who will only use the information to provide that Service. We may also share your personal information with other members of our corporate group.
- we may share alerts and information derived from identity verification checks with third parties for anti-money laundering and fraud prevention;
- we may disclose your personal information on request to the police or any other regulator or government authority to fulfill our regulatory responsibilities, to help prevent or detect fraud or any other type of crime, or for any other reasonable purpose identified by the relevant authority;
- Except as set out in this privacy policy, we will not sell or disclose your data to any third party;

- We may share your information in the event of a merger, acquisition, or sale of our assets. We shall communicate with you in the event of such a change.

## **5. TRACKING TECHNOLOGIES AND COOKIES**

5.1. We use cookies and similar tracking technologies to track the activity on Our Service and store certain information. You can instruct your browser to refuse all Cookies or to indicate when a cookie is being sent. However, if you do not accept Cookies, You may not be able to use some parts of our Program or Site.

## **6. Analytics**

6.1. We may use third-party Service providers to monitor and analyze the use of our Website and mobile apps.

6.2. One such service provider is Google. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Program and Site. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its advertising network.

6.3. You may opt-out of certain Google Analytics features through your mobile device settings, such as your device advertising settings, or by following the instructions provided by Google in their Privacy Policy: <https://policies.google.com/privacy>.

6.4. For more information on Google's privacy practices, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>.

6.5. We use the Embrace SDK (<https://embrace.io/privacy>) to anonymously collect only device environment information (OS version, device model, memory/CPU usage, network performance), in-app technical events (view loads, network calls, logs), and crash reports. No personal information, audio, video or persistent identifiers (IDFA, UDID, etc.) are collected. For details on data handling at Embrace, see their Privacy Policy at <https://embrace.io/privacy>.

## **7. LINKS TO OTHER WEBSITES**

1. Our Program and Site may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.
2. We have no control over and assume no responsibility for the Content, privacy policies, or practices of any third-party sites or services.

## **8. SECURITY OF YOUR PERSONAL INFORMATION**

8.1. The security of Your Personal Data is important to us but remember that no transmission method over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect Your Personal Data, we cannot guarantee its absolute security.

8.2. We restrict access to the information obtained from our websites and web pages to our employees, agents, Affiliates, Partners and contractors. We maintain physical, electronic, and procedural safeguards designed to protect personal information to the extent reasonably possible.

## **9. CONSENT REQUESTS AND PREFERENCES**

**9.1.** You may request us to identify the personal information we have collected and kept on our servers. To make such a request, contact us through our email provided below.

**9.2.** You may contact us to cancel, withdraw, or restrict the amount and type of information we collect and keep. We may keep on using some of your personal information even after your withdrawal if the information is necessary to run your account or fulfill legal obligations. We may also stop providing services that we would only give if we had the information you have withdrawn.

## **10. GDPR & COPPA Data Protection Rights**

This privacy policy has been construed to comply with the GDPR Data Protection Rights, the Children's Online Privacy Act and Children's Online Privacy Protection Rule.

To make sure that you are fully aware of all of your data protection rights,

Every user is entitled to the following:

- The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.



- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

## **11. Changes to this Privacy Policy**

**11.1.** We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

**11.2.** You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are significant when they are posted on this page.

## **12. CONTACT US**

If you have any questions about the provisions in this Privacy Policy, You can contact us by email support at scybot dot com