

Glowbe Privacy Policy

Effective Date: 22 May 2019

Glowbe has prepared this privacy policy ("Policy") to describe our privacy practices. We also use it to inform you about changes on the apps and websites offered by Glowbe ("Website") and new products and services.

This Policy applies to the Website and all of the products and services offered by Glowbe, the mobile or tablet versions thereof, any Glowbe software, and any applications created by Glowbe, however made available (collectively, the "Service"). Please note that the availability of any Glowbe applications on a social networking site, mobile or tablet device, internet television, or other technology platform does not indicate any relationship or affiliation between Glowbe and such social networking site, mobile or tablet device, or internet television, or other technology platform.

If you have any questions about this Policy, please feel free to contact us. See the "Contact" section below for contact information.

1. Information We Collect

Information you provide – When you use our Service, we may collect your device ID and certain device information. When you sign up for a Glowbe account, we ask you for personal information such as your name, e-mail, gender, age and your goals in order to provide you with a personalized program, better experience and to improve the quality of our Service.

We use your name, e-mail address, and other information to inform you of new product releases, service notifications, events, and to solicit your feedback and input. We also use your information, or a portion thereof, to send you marketing materials and/or Glowbe newsletters or other information Glowbe thinks you would be interested in, unless you notify Glowbe that you do not wish to receive such materials. Please contact us using the information in the Contact section below to request that you not be sent any or all of such information, or opt-out of any email messages you receive from Glowbe to stop receive future marketing emails.

Glowbe cookies - When you visit Glowbe, we send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser. We use cookies to improve the quality of our Service by storing user preferences and tracking user trends. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Glowbe features and services will not function properly if your cookies are disabled. Cookies collect the date and time of your visit, your registration information, and other technical information.

Glowbe uses persistent cookies. This means that the cookie stays on your hard drive until you delete it. You can delete our cookie at any time by following the instructions contained in your browser's help file, or by contacting the company providing your browser's technical support. Glowbe does not use cookies to store information such as credit card numbers, telephone numbers, or any other sensitive information.

Glowbe uses cookies to deliver content specific to your interests, to save your password so you don't have to re-enter it each time you visit our Website, and for other purposes.

Activity Information - In order to provide the best possible service and to allow us to make certain internal reports and make recommendations, we collect aggregate information about the use of the Service, including information about users accessing the Website such as internet protocol addresses, browser type, browser language, referring / exit pages and URLs, other browser history, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your visit, and other technical information.

IP Address - An Internet Protocol (IP) address is a number that's automatically assigned to your computer whenever you're surfing the Web. We retain your IP address in order to help us diagnose problems with our servers, to administer our Website, to help identify you, to gather broad anonymous demographic and location information (such as the number of visitors from a geographic area), to enforce compliance with the Website terms and conditions, or otherwise in order to protect our services, sites, customers, or others.

Log information - When you use the Service, our servers automatically record information that your browser sends whenever you visit a Website. These server logs include information such as your web request, IP address, browser type, browser language, the date and time of your request, and one or more cookies that uniquely identify your browser.

User communications - When you send email or other communication to Glowbe, we retain those communications in order to process your inquiries, respond to your requests, and improve our services.

Affiliated sites - We offer some of our Services in connection with other websites. Personal information that you provide to those websites is sent to Glowbe in order to deliver the Service. We process such information in accordance with this Policy. The affiliated websites have different privacy practices and we encourage you to read their privacy policies.

Links - Glowbe presents links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our Website.

2. Information Use and Sharing

We use your personal information for the purposes described in this Policy and/or any privacy notice provided for specific Services. Such purposes include, but are not limited to:

- Providing our Services to users, including the display of customized content and advertising;
- Sharing information to our business partners who perform core services (such as hosting, billing, data storage, security, and reporting services) related to the operation of the Service;
- Collecting and processing information about your actual location to provide location-aware products, services, and other content;

- Verifying your identity;
- Auditing, research and analysis in order to maintain, protect, and improve our Services;
- Ensuring the technical functioning of our network; and
- Developing new Services.

We may share technical or personal information that has been anonymized or aggregated without limitation.

3. Your Choices

When you sign up for the Service, we ask you to provide personal information. If we use this information in a manner different than those described in this Policy and/or in the specific service notices, then we will ask for your consent prior to such use. If you no longer wish to receive email notifications from Glowbe, please let us know by contacting us. Please specify which notifications you no longer wish to receive and provide your exact name, email address and/or physical address so that we can do our best to ensure that you stop receiving the notifications that you no longer wish to receive.

If we propose to use personal information for any purposes other than those described in this Policy and/or in the specific service notices, and you decline, Glowbe may not be able to provide its Service to you.

We may partner with third-party ad networks and other ad serving providers ("Advertising Providers") that serve ads on our behalf and others' on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your use of the Website and other sites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

We may also work with third parties that collect data about your use of the Website and other sites or apps over time for non-advertising purposes. For example, Glowbe uses Google Analytics and other third-party services to improve the performance of the Website and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Website, visit www.google.com/policies/privacy/partners/, and to opt out of Google Analytics, visit tools.google.com/dlpage/gaoptout/.

When you use the Service, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected, or removed before processing such requests, and we in some cases decline to process requests in certain circumstances. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

4. Data Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. These include internal reviews of our data collection, storage and processing practices, and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal information.

We restrict access to personal information to Glowbe employees, contractors, and agents who need to know that information in order to operate, develop, or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

However, please note that no data transmission over the Internet can be guaranteed to be 100% secure, so while Glowbe strives to protect your information, Glowbe cannot ensure or warrant the security of any information that you voluntarily give to Glowbe.

5. Website Areas Beyond Glowbe's Control

Glowbe may choose various third party websites to link to, link from, and frame within, the Website. Glowbe also may participate in co-branding and other relationships to offer e-commerce and other services and features to its users. However, even if the third party is affiliated with Glowbe, we have no control over these linked sites, each of which has separate privacy and data collection practices independent of Glowbe. We have no responsibility or liability for these independent policies or actions and are not responsible for the privacy practices or the content of any such websites. Please make sure you are comfortable with the privacy practices of every site you visit before providing the site with your personal information. These linked sites are only for your convenience and you therefore access them at your own risk.

We also may make chat rooms, forums, and message boards available to you through the Services. Please remember that we cannot control the information that is shared by members and that anything you voluntarily provide in any public area of the Internet will be publicly available to other visitors on that website and potentially to other third parties. Thus, please note that you should always exercise caution when deciding to publicly disclose any of your personal information in these and similar areas.

6. International Visitors

This section applies to those that visit our Website or use our Service from the European Economic Area, the United Kingdom, and Switzerland.

Glowbe processes personal information with your consent (e.g., when you agree that Glowbe may place cookies, or when Glowbe processes personal information submitted for specified purposes). On other occasions, Glowbe may process personal information when it needs to do this to fulfil a contract (for example, for billing purposes) or where required to do so by law.

If necessary, Glowbe may also process personal information when it is in Glowbe's legitimate interests to do this (e.g., for customer service or fraud detection) and when these interests are not overridden by your data protection rights. If you wish to exercise the right to withdraw consent, please contact us. See the "Contact" section below for contact information.

Please be aware that the personal information we collect may be transferred to and maintained on servers or databases located outside your state, province, country, or other jurisdiction, where the privacy laws may not be as protective as those in your location.

You have a right to the following:

- To request access to the personal information we hold about you;
- To request that we rectify or erase your personal information;
- To request that we restrict or block the processing of your personal information;
- Under certain circumstances, to receive personal information about you that we store and transmit to another without hindrance from us, including requesting that we provide your personal information directly to another, i.e., a right to data portability; and
- Where we previously obtained your consent, to withdraw consent to processing your personal information.

To exercise these rights, see the "Contact" section below. Please be aware that Glowbe may be unable to provide these rights to you under certain circumstances, such as if we are legally prevented from doing so.

We will process and store your personal information only for the period necessary to achieve the purpose of the storage, or as permitted by law. We will retain and use your personal information to the extent necessary to enforce our agreements. The criteria used to determine the period of storage of personal information is the respective statutory retention period or six years in the case of contracts. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract or the initiation of a contract or for other lawful purposes.

CALIFORNIA DO NOT TRACK DISCLOSURES

"Do Not Track" is a privacy setting that users can set in their web browsers or applications. If a user turns on a Do Not Track signal in their phone, the phone transmits a message to websites and apps requesting that they do not track the user. The company has not implemented a methodology to respond to Do Not Track signals.

7. Enforcement

Glowbe regularly reviews its compliance with this Policy. Please feel free to direct any questions or concerns regarding this Policy or Glowbe's treatment of personal information by contacting us using the information in the Contact section below.

When we receive formal written complaints at this address, it is Glowbe's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection

authorities, to resolve any complaints regarding the transfer of personal information that cannot be resolved between Glowbe and an individual.

8. Users Under 18

Glowbe's content is not directed at users under eighteen (18) years of age, and if you provide information about yourself as a user of Glowbe, you are representing that you are at least eighteen (18) years of age. We do not knowingly collect personal information from anyone under eighteen (18) years of age, but if we do become aware of having collected personal information from a user who is younger than eighteen (18) years of age, we will remove such information from our files.

9. Changes To This Policy

This Policy may be amended from time to time. You should visit this page periodically to review any changes to the Policy. If we believe that the changes are material, Glowbe will let you know by doing one (or more) of the following: (i) posting the changes on or through the Website or Service, or (ii) sending you an email or message about the changes.

10. Glowbe Terms and Conditions of Use

A complete statement of our [Terms and Conditions of Use can be found here](#). Glowbe's Terms and Conditions of Use are expressly incorporated into this Policy by this reference.

11. Contact

If you have any questions, comments, or concerns about this privacy policy, please contact us at:

support@glowbe.me