

Privacy Policy

Effective Date: June 16, 2020

Thanks for visiting dAAb Global, LLC! dAAb (“dAAb”, “we”, “us” or “our”) respects your privacy. When it comes to your personal information, we believe in transparency, not surprises. That’s why we’ve set out here what personal information we collect, what we do with it and your choices and rights.

By using any of DAAb’s Services, you confirm you have agreed to the Terms and Conditions and read and understood this Privacy Policy.

1. Some key terms

In our Privacy Policy, when we refer to “Users”, we mean our customers who use our Services, including visitors to our sites. We explain who we are in the “Who is dAAb?” section below. The users, visitors and customers of, our Users’ sites are “End Users”. Any other capitalized terms not defined in this Privacy Policy have the meanings in our Terms and Conditions.

2. How does this Privacy Policy apply?

This Privacy Policy describes what we do with personal information that we collect and use for our own purposes (i.e., where we are a controller), such as your account information and information about how you use and interact with our Services, including information you submit to our customer support as well as certain information relating to your End Users. This Privacy Policy does not apply to personal information of our employees or job applicants (except to the extent employees or job applicants are Users).

We use cookies and similar technologies. Our Cookie Policy describes what we do in that regard.

We also host and process User Content on behalf of our Users. Our Users tell us what to do with User Content, and we follow their instructions. This Privacy Policy does not describe what we do with User Content on our Users’ instructions (i.e., as their processor or service provider). If you are an End User of one of our User’s sites and want to know how a User handles your information, you should check the site’s privacy policy, if applicable.

3. Personal information we collect

We collect various personal information regarding you or your device. This includes the following:

- Information you provide to create an Account, specifically email address, first name and last name. If you provide any payment information, we receive a portion of your payment information from our payment processor (such as the last four digits, the country of issuance and the expiration date of the payment card) and we ask you to select your jurisdiction.
- Your marketing preferences.
- The emails and other communications that you send us or otherwise contribute, such as customer support inquiries or posts to our customer message boards or forums. Please be aware that information on public parts of our sites is available to others.
- Information you share with us in connection with surveys, contests or promotions.

- Information from your use of the Services or Users' sites. This includes: IP addresses, preferences, web pages you visited prior to coming to our or our Users' sites, information about your browser, network or device (such as browser type and version, operating system, internet service provider, preference settings, unique device IDs and language and other regional settings), information about how you interact with the Services and our Users' sites (such as timestamps, clicks, scrolling, browsing times, searches, transactions, referral pages, load times, and problems you may encounter, such as loading errors).
- Information we get from our partners to support our marketing initiatives, improve our Services and better monitor, manage and measure our ad campaigns, such as details about when a partner of ours shows you one of our ads on or via its advertising platform.
- Other information you submit to us directly or through Third Party Services if you use a Third Party Service to create an Account (based on your privacy settings with such Third Party Service).

4. How we collect personal information

We obtain personal information from various sources. We do this in three main ways:

- You provide some of it directly (such as by registering for an Account).
- We record some of it automatically when you use our Services or Users' sites (including with technologies like cookies).
- We receive some of it from third parties (like when you register for an account using a Third Party Service or when you make payments to us using our payment processor or via a mobile app store).

We've described this in more detail below.

a. Personal information you provide

When you use our Services, we collect information from you in a number of ways. For instance, we ask you to provide your name and email address to register and manage your Account. We also maintain your marketing preferences and the emails and other communications that you send us or otherwise contribute, such as customer support inquiries or posts to our customer message boards or forums. You might also provide us with information in other ways, including by responding to surveys, submitting a form or participating in contests or similar promotions.

Sometimes we require you to provide us with information for contractual or legal reasons. For example, we may ask you to select your jurisdiction when you sign up for Paid Services to determine if, and how much, tax we need to collect from you. We'll normally let you know when information is required, and the consequences of failing to provide it. If you do not provide personal information when requested, you may not be able to use our Services if that information is necessary to provide you with the service or if we are legally required to collect it.

b. Personal information obtained from your use of our Services

When you use our Services, we collect information about your activity on and interaction with the Services, such as your IP address(es), your device and browser type, the web page you visited before coming to our sites, what pages on our sites you visit and for how long and identifiers associated with

your devices. If you've given us permission through your device settings, we may collect your location information in our mobile apps.

If you are an End User of our Users' sites, we also get information about your interactions with their sites, though we use this in anonymous, aggregated or pseudonymized form which does not focus on you individually. We use this data to evaluate, provide, protect or improve our Services (including by developing new products and services).

Some of this information is collected automatically using cookies and similar technologies when you use our Services and our Users' sites. We let our Users control what cookies and similar technologies are used through their sites (except those we need to use to properly provide the Services, such as for performance or security related reasons). You can read more about our use of cookies in our Cookie Policy. Some of this information is similarly collected automatically through your browser or from your device.

c. Personal information obtained from other sources

If you use a Third Party Service (such as Google) to register for an Account, the Third Party Service may provide us with your Third Party Service account information on your behalf, such as your name and email address (we don't collect or store passwords you use to access Third Party Services). Your privacy settings on the Third Party Service normally control what they share with us. Make sure you are comfortable with what they share by reviewing their privacy policies and, if necessary, modifying your privacy settings directly on the Third Party Service.

If you sign up for Paid Services directly with us, we obtain limited information about your payment card from our payment processor, such as the last four digits, the country of issuance and the expiration date. Currently, our payment processor is Square. Square uses and processes your complete payment information in accordance with Square's privacy policy. This paragraph is not applicable if you sign up for Paid Services as an in-app purchase via a mobile app store. Please see Google's privacy policy and Apple's privacy policy for information about how they use and process your payment information.

5. How we use your personal information

We use the personal information we obtain about you for the following purposes:

- Provision of the Services. Create and manage your Account, provide and personalize our Services, process payments and respond to your inquiries.
- Communicating with you. Communicate with you, including by sending you emails about your transactions and Service-related announcements.
- Surveys and contests. Administer surveys, contests and other promotions.
- Promotion. Promote our Services and send you tailored marketing communications about products, services, offers, programs and promotions of dAAb and our partners and measure the success of those campaigns. For example, we may send different marketing communications to you based on your subscription plan or what we think may interest you based on other information we hold about you.
- Advertising. Analyze your interactions with our Services and third parties' online services so we can tailor our advertising to what we think will interest you. For example, we may decide not to

advertise our Services to you on a social media site if you already signed up for Paid Services or we may choose to serve you a particular advertisement based on your subscription plan or what we think may interest you based on other information we hold about you.

- Customizing the Services. Provide you with customized services. For example, we use your location information to determine your language preferences or display accurate date and time information. We also use cookies and similar technologies for this purpose, such as remembering which of Your Sites you most recently edited.
- Improving our Services. Analyze and learn about how the Services are accessed and used, evaluate and improve our Services (including by developing new products and services and managing our communications) and monitor and measure the effectiveness of our advertising. We usually do this based on anonymous, pseudonymized or aggregated information which does not focus on you individually. For example, if we learn that most Users of Paid Services use a particular integration or feature, we might wish to expand on that integration or feature.
- Security. Ensure the security and integrity of our Services.
- Third party relationships. Manage our vendor and partner relationships.
- Enforcement. Enforce our Terms of Service and other legal terms and policies.
- Protection. Protect our and others' interests, rights and property (e.g., to protect our Users from abuse).
- Complying with law. Comply with applicable legal requirements, such as tax and other government regulations and industry standards, contracts and law enforcement requests.

We process your personal information for the above purposes when:

- Consent. You have consented to the use of your personal information in a particular way. When you consent, you can change your mind at any time.
- Performance of a contract. We need your personal information to provide you with services and products requested by you, or to respond to your inquiries. In other words, so we can perform our contract with you or take steps at your request before entering into one. For example, we need your email address so you can sign in to your dAAb account.
- Legal obligation. We have a legal obligation to use your personal information, such as to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request.
- Legitimate interests. We have a legitimate interest in using your personal information. In particular, we have a legitimate interest in the following cases:
 - To operate the dAAb business and provide you with tailored advertising and communications to develop and promote our business.
 - To analyze and improve the safety and security of our Services - we do this as it is necessary to pursue our legitimate interests in ensuring dAAb is secure, such as by

implementing and enhancing security measures and protections and protecting against fraud, spam and abuse.

- To provide and improve the Services, including any personalized services - we do this as it is necessary to pursue our legitimate interests of providing an innovative and tailored offering to our Users on a sustained basis.
- To share your personal information with other dAAb group companies that help us provide and improve the Services.
- To anonymize and subsequently use anonymized information.
- Protecting you and others. To protect your vital interests, or those of others.
- Others' legitimate interests. Where necessary for the purposes of a third party's legitimate interests, such as our partners who have a legitimate interest in delivering tailored advertising to you and monitoring and measuring its effectiveness or our Users who have a legitimate interest in having their sites function properly and securely and analyzing the usage of their sites so they can understand trends and improve their services.

6. How we share your personal information

We share personal information in the following ways:

- Affiliates. We share personal information with our affiliates when it is reasonably necessary or desirable, such as to help provide services to you or analyze and improve the services we or they provide.
- Users. We share with our Users data regarding usage by End Users of their sites. For example, we provide a User with information about what web page the End User visited before coming to their site and how their End Users interacted with their site. This is so Users can analyze the usage of their sites and improve their services.
- Business partners. We may share personal information with business partners. For example, we may share your personal information when our Services are integrated with their Third Party Services, but only when you have been informed or would otherwise expect such sharing.
- Service providers. We share personal information with our service providers that perform services on our behalf. For example, we may use third parties to help us provide customer support, manage our advertisements on other sites, send marketing and other communications on our behalf or assist with data storage.
- Process payments. We transmit your personal information via an encrypted connection to our payment processor.
- Following the law or protecting rights and interests. We disclose your personal information if we determine that such disclosure is reasonably necessary to comply with the law, protect our or others' rights, property or interests (such as enforcing our Terms and Conditions) or prevent fraud or abuse of dAAb or our Users or End Users. In particular, we may disclose your personal

information in response to lawful requests by public authorities, such as to meet national security or law enforcement requirements.

- Advertising. We share personal information with third parties so they and we can provide you with tailored advertising and measure and monitor its effectiveness. For example, we may share your pseudonymized email address with a third party social media platform on which we advertise to avoid serving dAAb ads to people who already use dAAb.
- Business transfers. If we're involved in a reorganization, merger, acquisition or sale of some or all of our assets, your personal information may be transferred as part of that deal or the negotiation of contemplated deals.

7. Your rights and choices

Where applicable law requires (and subject to any relevant exceptions under law), you may have the right to access, update, change or delete personal information.

You can access, update, change or delete personal information (or that of your End Users) either directly in your Account or by contacting us at privacy@dAAonline.com to request the required changes. You can exercise your other rights (including deleting your Account) by contacting us via your Account at the same email address. Please note that we may need to verify your identity in connection with your requests, and such verification process may, if you do not have access to your Account, require you to provide us with additional information (e.g. government identification). Even if you have access to your Account, we may request additional information if we believe it's necessary to verify your identity. If we are unable to verify your identity or request, we may not, in accordance with applicable law, be able to fulfill your request.

You can also elect not to receive marketing communications by changing your preferences in your Account or by following the unsubscribe instructions in such communications.

Please note that, for technical reasons, there is likely to be a delay in deleting your personal information from our systems when you ask us to delete it. We also will retain personal information in order to comply with the law, protect our and others' rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.

You may have the right to restrict or object to the processing of your personal information or to exercise a right to data portability under applicable law. You also may have the right to lodge a complaint with a competent supervisory authority, subject to applicable law.

Additionally, if we rely on consent for the processing of your personal information, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal.

Our Cookie Policy explains how you can manage cookies and similar technologies.

If you are an End User of one of our User's sites, you should contact them to exercise your rights with respect to any information they hold about you.

8. How we protect your personal information

While no service is completely secure, we have a security team dedicated to keeping personal information safe. We maintain administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse and any other unlawful form of processing, of the personal information in our possession. We employ security measures such as using firewalls to protect against intruders, building redundancies throughout our network (so that if one server goes down, another can cover for it) and testing for and protecting against network vulnerabilities.

9. How we retain your personal information

We retain personal information regarding you or your use of the Services for as long as your Account is active or for as long as needed to provide you or our Users with the Services. We also retain personal information for as long as necessary to achieve the purposes described in this Privacy Policy, for example, to comply with our legal obligations, to protect us in the event of disputes and to enforce our agreements and to protect our and others' interests.

The precise periods for which we keep your personal information vary depending on the nature of the information and why we need it. Factors we consider in determining these periods include the minimum required retention period prescribed by law or recommended as best practice, the period during which a claim can be made with respect to an agreement or other matter, whether the personal information has been aggregated or pseudonymized, and other relevant criteria. For example, the period we keep your email address is connected to how long your Account is active, while the period for which we keep a support message is based on how long has passed since the last submission in the thread.

As Users may have a seasonal site or come back to us after an Account becomes inactive, we don't immediately delete your personal information when your trial expires or you cancel all Paid Services. Instead, we keep your personal information for a reasonable period of time, so it will be there for you if you come back.

You may delete your Account by contacting us at privacy@dAAbonline.com and dAAb will delete the personal information it holds about you (unless we need to retain it for the purposes set out in this Privacy Policy).

Please note that in the course of providing the Services, we collect and maintain aggregated, anonymized or de-personalized information which we may retain indefinitely.

10. Data transfers

Personal information that you submit through the Services may be transferred to countries other than where you live, such as, for example, to our servers in the U.S. We also store personal information locally on the devices you use to access the Services.

Your personal information may be transferred to countries that do not have the same data protection laws as the country in which you initially provided the information.

We rely upon a number of means to transfer personal information. These include:

- Privacy Shield. We transfer personal information to companies that have certified their compliance with the Privacy Shield Frameworks (each individually and jointly, the “Privacy Shield”), including dAAb, Inc.
- Standard data protection clauses. We may transfer personal information to recipients that have entered into an approved contract for the transfer of personal data.

11. Privacy Shield

dAAb, Inc. has certified its compliance to the Privacy Shield.

Our accountability for personal information we receive under the Privacy Shield and subsequently transfer to a third party is described in the Privacy Shield Principles. In particular, we may use third parties to process data on our behalf as described in this Privacy Policy, and we remain liable if they do so in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage.

If you have a question or complaint you believe to be within the scope of our Privacy Shield certification, please contact us first at privacy@dAAbonline.com, or using the contact details in the “How to contact us” section below. We'll respond within 45 days.

For any complaints that we can't resolve directly, JAMS is the independent organization responsible for reviewing and resolving complaints about our Privacy Shield compliance. You can contact JAMS free of charge at <https://www.jamsadr.com/eu-us-privacy-shield>. JAMS is an alternative dispute resolution provider based in the U.S.

12. End Users' personal information

Our customers who have created a site using dAAb are responsible for what they do with the personal information they collect, directly or through dAAb, about their End Users. This Section 12 is directed to such customers.

a. Your relationship with End Users

If you're one of our Users, you will collect personal information about your End Users. For example, during checkout you may ask your End Users to provide their name, address, email address and payment information so that you can complete their orders. You may also use cookies and similar technologies to analyze usage and other trends.

You're solely responsible for complying with any laws and regulations that apply to your collection and use of your End Users' information, including personal information you collect about them from us or using dAAb functionality or cookies or similar technologies.

You must publish your own privacy and cookie policies and comply with them.

We're not liable for your relationship with your End Users or how you collect and use personal information about them (even if you collect it from us or using dAAb functionality or cookies or similar technologies) and we won't provide you with any legal advice regarding such matters.

b. End User payment information

Your End Users' payment information may be processed via third party eCommerce Payment Processors with which you integrate your Account, in accordance with such eCommerce Payment Processors' terms and policies. We transmit your End Users' complete payment information when they initially provide or update it only so that we can pass it along to the eCommerce Payment Processors you agree to use. We don't collect or store your End Users' payment information.

13. California Residents

This Section 13 is only applicable to you if you are a resident of the state of California in the US ("California Residents") and only applies to personal information for which dAAb is a "Business" (as defined in the CCPA), but does not apply to personal information we collect from you in the course of our provision of services to you where you are an employee, owner, director, officer or contractor of a company, partnership, sole proprietorship, non-profit or government agency. It applies to personal information we collect from California Residents on or through our Services and through other means (such as information collected offline or in person).

a. Categories, business and commercial purposes, sources and third parties

California law requires us to disclose certain information regarding the categories of personal information we collect. The following is a list of all categories of personal information which dAAb collects, or has collected, from California Residents, in the twelve (12) months prior to the effective date of this Privacy Policy (each, a "Category"), together with, for each Category: (1) the categories of sources from which such Category is collected; and (2) the categories of third parties with whom we share such Category.

- Identifiers: (1) sources: you (either directly or through a Third Party Service), collected by the Services, business partners, service providers and payment processors; and (2) third parties: business partners, service providers and payment processors.
- Commercial information: (1) sources: you (either directly or through a Third Party Service), collected by the Services, business partners and service providers; and (2) third parties: business partners, service providers and payment processors.
- Financial data: (1) sources: you (either directly or through a Third Party Service), business partners and payment processors; and (2) third parties: business partners, service providers and payment processors.
- Internet or other network or device activity: (1) sources: you (either directly or through a Third Party Service), collected by the Services, business partners, service providers and payment processors; and (2) third parties: business partners, service providers and payment processors.
- Location information: (1) sources: you (either directly or through a Third Party Service), collected by the Services, business partners and service providers; and (2) third parties: business partners, service providers and payment processors.
- Sensory information: (1) sources: you (either directly or through a Third Party Service) and service providers; and (2) third parties: business partners, service providers and payment processors.

- Other information that identifies or can be reasonably associated with you: (1) sources: you (either directly or through a Third Party Service), collected by the Services, business partners, service providers and payment processors; and (2) third parties: business partners, service providers and payment processors.

Each Category is collected for the following business purposes: (i) providing the Services (including without limitation maintaining your Account, processing and fulfilling orders, and administering surveys and contests); (ii) providing customer support for the Services; (iii) operating the Services (including without limitation managing third party relationships and enabling usage of our service providers); (iv) communicating with you; (v) customizing the Services; (vi) securing and protecting the Services (including without limitation auditing the Services, bug and fraud detection, debugging and repair of errors and the detection, protection and prosecution of security incidents or illegal activity); (vii) enforcing our terms and policies; (viii) complying with law; (ix) verifying your identity; and (x) other business purposes about which we may notify you from time to time.

Each Category is collected for uses that advance our commercial or economic interests such as: (i) promoting surveys and contests; (ii) promoting and advertising the Services; (iii) customizing the Services; (iv) improving our Services; (v) communicating with you about relevant offers from third parties; and (vi) other commercial purposes about which we may notify you from time to time.

b. Your requests

Subject to certain exceptions and restrictions, the CCPA provides California Residents the right to submit requests to a business which has collected their personal information: (i) to provide them with access to the specific pieces and categories of personal information collected by the business about such California Resident, the categories of sources for such information, the business or commercial purposes for collecting such information, and the categories of third parties with which such information was shared; and (ii) to delete such personal information (each, a “California Request”). We need certain types of information so that we can provide our Services to you. If you ask us to delete some or all of your information, you may no longer be able to access or use the Services.

If you are a California Resident, please follow the instructions in the “Your rights and choices” section above to submit California Requests and please make sure you note that you are a California Resident when you do so. California Residents may designate an authorized agent to make California Requests on their behalf. In order to designate an authorized agent to make a California Request on your behalf, you must provide a valid power of attorney, the requester’s valid government issued identification and the authorized agent’s valid government issued identification.

c. We do not sell your personal information

We do not sell your personal information, as that term is defined based on our understanding of the CCPA and its implementing regulations. We have not sold any personal information to third parties for a business or commercial purpose in the 12 months prior to the effective date of this Privacy Policy. We do share personal information with third parties for the business and commercial purposes described in this Section 13, including without limitation advertising and marketing based on Users’ online activities over time and across different sites, services and devices.

d. We do not discriminate against you

You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. dAAb does not discriminate against California Residents for exercising their rights.

14. Updates to this Privacy Policy

We'll update this Privacy Policy from time to time to reflect changes in technology, law, our business operations or any other reason we determine is necessary or appropriate. When we make changes, we'll update the "Effective Date" at the top of the Privacy Policy and post it on our sites. If we make material changes to it or the ways we process personal information, we'll notify you (by, for example, prominently posting a notice of the changes on our sites before they take effect or directly sending you a notification).

We encourage you to check back periodically to review this Privacy Policy for any changes since your last visit. This will help ensure you better understand your relationship with us, including the ways we process your personal information.

15. Who is dAAb?

When we say "dAAb" (or "we", "us" or "our"), we mean: (a) dAAb, Inc. if you are a resident of or have your principal place of business in the United States of America or any of its territories or possessions (the "US").

If your place of residence or principal place of business changes, the dAAb entity that controls your personal information will be determined by your new residence or principal place of business from the date it changes.

16. How to contact us

If you have questions, comments or complaints about this Privacy Policy or our privacy practices or if you would like to exercise your rights and choices, please email us at privacy@dAAbonline.com, or write to us at the addresses below:

If you are a resident of or have your principal place of business in the US:

dAAb Global, LLC
Attention: Privacy
P.O. Box 672
Aberdeen, Maryland 21001