AdHub Privacy Policy

Last Updated October 21, 2021

This Privacy Policy ("Privacy Policy") explains how AdHub a mobile app of KnectUp, LLC. ("knectUp", "AdHub", "us", "our", and "we") collects, uses, and shares information when you interact with us. This Privacy Policy applies to all users of KnectUp's website as published at www.knectup.com (and any other websites with "knectup" or "adhub" branding that link to this Privacy Policy), and any mobile-device applications we offer, such as our iOS and Android applications, that are branded "AdHub" and link or reference this Privacy Policy (collectively, the "Services").

Please read this Privacy Policy carefully. This Privacy Policy replaces and supersedes the last version of this Privacy Policy for all users (including for those users that registered prior to the Effective Date). If you do not agree to our practices, please do not register, subscribe, create an account, or otherwise interact with the Services. By signing up for, using, or continuing to use the Services, you consent to the privacy practices described in this policy.

This Privacy Policy is incorporated into and is subject to the AdHub Terms of Use. Capitalized terms that are not defined in the Privacy Policy have the meaning given to them in the Terms of Use.

Our Privacy Policy is organized as follows:

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1. Types of Information We Collect.

We may ask you to provide information when you register, subscribe, or create an account for our Services, provide a 3rd party payment service (i.e., PayPal or Venmo), contact KnectUp for customer service purposes, or otherwise interact with or use the Services. We may collect certain types of information, including information that can be used to reasonably identify you, such as your name, email address, phone number, date of birth, geographic location, and mobile device data (as described below) ("Personal Information"), and information that does not identify you personally. We may collect the following types of information, including Personal Information:

- Registration and Contact Information that allows you to register for the Services and allows us to communicate with you, such as your name, email address, password, telephone number, or other address at which you receive communications from or on behalf of KnectUp.
- Third-Party Payment Provider (e.g., PayPal Inc, Venmo) ("Authorized Money Transmitter"). As part of registration, a legitimate and personal PayPal or Venmo account (which could be your telephone number, or email address if you use them as your username) is required for participation in the AdHub Returns program. We do not collect payment card account number/expiration/security code information, bank account information.
- Transaction Information about how you interact with the Services, such as Ads viewed, Ad news feed, and Ad industry and market information provided via our Services
- We may allow third parties to collect non-personal data through their own embedded technology. In order to deliver ads to you, the third-party advertising companies may place or recognize a unique cookie or similar technology for non-personally identifiable information.
- Ad Hub uses Google AdMob services. AdMob will provide you with an advertising experience. To deliver the ads, we embed a SDK (Software Development Kit) from AdMob. The SDK may collect data to tailor ads to you, such as the third-party apps you installed on your device, your advertising identifier, and other technical information. You can find more information about how Google AdMob uses data when you use partners' sites or apps at https://policies.google.com/technologies/partner-sites. Additionally, you can view Google's Privacy Policy at http://google.com/intl/en/policies/privacy/.
- Our 3rd party Ad service providers may collect location Information including state/province, city, or zip code, as well as precise location data and associated time of day, if you have activated Location-based information services on your mobile device and permitted your mobile device to transmit location data. For more information, please reference AdMob Privacy & Terms.
- Mobile Device Information. Our 3rd party Ad service providers may collect certain information about your mobile device when you use our Services, including device identifier (such as the Android Advertising ID and the Apple iOS IDFA), user settings, the make, model, and operating system of your device, information about other applications installed on your device (and, if you use an Android-based mobile device, how you use them e.g., frequency and duration of use), and information about your use of our Services while using the device, such as your use of features, functions, or clicks on notifications or content. For more information, please reference AdMob Privacy & Terms.
- Information from Cookies and Similar Technologies. KnectUp does not use Cookies and similar technologies. However, when you use our Services, 3rd party Ad service providers may collect certain information using cookies and similar technologies.

2. How KnectUp Uses Information.

You use AdHub as your advertising market learning and ad engagement companion, and we and our partners will use the information we collect from and about you in many ways to help you learn about the Advertising market as well as receiving Ads, which you have the option of visiting an Advertisers website based on your interest. For more information, please reference AdMob <u>Privacy & Terms</u>.

KnectUp and our partners use information to:

- Operate and improve our Services, including web hosting;
- Sending emails on our behalf;
- Having third parties process payments;
- Analyze and understand how you use our Services;
- Evaluate the types of Ads, products, or services that may be of interest to you and provide you
 with Ads from participating brands and retail clients that are more relevant to you, including
 offers based on variables such as stated and anticipated user interests, personal
 characteristics, consumption of advertisements, past shopping list placements or searches,
 past offer redemptions, or user location; Evaluate eligibility of users for certain offers,
 products or services;
- Perform aggregated, pseudonymous (unless otherwise consented to by you) analytics that
 may be used for KnectUp any third parties' marketing, advertising, and data enrichment
 activities;
- Provide customer support to users;
- Fulfill requests for KnectUp services;
- Communicate and provide additional information which may be of interest to you about KnectUp business partners, such as AdHub news, special offers, announcements, and marketing materials;
- Send you reminders, technical notices, updates, security alerts and support and administrative messages service bulletins, or marketing;
- Provide advertisements and marketing solicitations to you through the Services, email messages, text messages, push notifications, applications, or other methods of communication;
- Administer surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our partners;
- Manage our everyday business needs such as website administration, forum management, analytics, fraud prevention, Terms of Use or to comply with the law; and
- Carry out other purposes to which you consent. In addition to the foregoing, we may aggregate information and use it for any purpose.

3. When and Why KnectUp Discloses Information Service Providers.

Providers. We may share information with our service providers that provide services for us to assist us in carrying out the purposes described in Section 2 above.

Merchants and Business Partners

We may work with various partners so they can provide advertising, and marketing to you when you use our Services. To facilitate these activities, we may share information about you with our partners. You may be able to adjust how we share information by changing options within the Services. We

encourage KnectUp business partners to adopt and post their privacy policies. The use of your information by such parties is governed by their privacy policies and is not subject to our control. When you choose to interact with an KnectUp business partner, we encourage you to read any privacy policy they may have posted on their website.

Third Parties

KnectUp shares information with third parties and service providers, but other than (i) hashed information, device identifiers, or location information (in each case anonymized and/or pseudonymized), and (ii) information shared with third party service providers who only use the information to assist us with internal management of our Services (for example, to detect and prevent fraud), we do not disclose your contact information or other personally identifiable information (PII). We share information with third parties to assist us in carrying out the purposes described in Section 2 above.

Merger, Sale, or Other Asset Transfers

We may share your information to effect a merger, acquisition, or otherwise, and to support the sale or transfer of business assets. If KnectUp is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or prominent notice on one or more of our Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

As Required by Law, to Enforce Laws and Similar Disclosure

We may also disclose Personal Information to defend ourselves in litigation or a regulatory action; when required or advised to do so by law, such as in response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States and other countries where we operate; to enforce our rights or protect our property; to protect the rights, property or safety of others, investigate fraud, respond to a government request; or as needed to support auditing, compliance, and corporate governance functions.

Analytics

We use other third-party services, such as Google AdMob, to understand how users are engaging with ads served on AdHub via 3rd Party Ad providers - AdMob. AdMob privacy and terms are described at - https://policies.google.com/technologies/partner-sites

Aggregate Data

KnectUp may also disclose information about you that is not personally identifiable. For example, we may provide our business partners, or other third parties with reports that contain aggregated data, statistical data, and/or anonymized data.

Consent

We may also share your information with your consent.

4. Your Choices.

We think that you benefit from a more personalized experience when we know more about you and the kinds of offers you like. However, you can limit the information you provide to KnectUp, and you can limit the communications that KnectUp sends to you. For further information about your specific rights to any personal information that KnectUp collects about you, please refer to Section 9 - Privacy Notice.

Email

You can manage your email preferences by sending an email to support@knectup.com. You may also manage your email preferences by sending an email to support@knectup.com with the subject and body stating "unsubscribe".

Cookies

AdHub does not use cookies. However, 3rd party Ad service providers or sites visited using the AdHub mobile app may use cookies. You may manage how your browser handles cookies and related technologies by adjusting its privacy and security settings. You can opt-out of being targeted by certain third-party advertising companies online at www.networkadvertising.org/consumer/opt_out.asp and http://www.aboutads.info/choices/. KnectUp honors these ad tracking opt-out requests.

Mobile

Some of the features of the Service may enable the AdHub mobile app to access and collect information about your current or past location in order to personalize the Service for you and provide other features of the Services ("Location-based Features"). In order to use Location-based Features, you must give AdHub permission to use your geo-location through your device. AdHub may access your geo-location using a variety of means, including GPS, IP address, or cell tower location. You may opt-out of using Location-Based Features by going to Settings and turning off the "Nearby Store Alerts" feature. Alternatively, you may adjust the settings on your mobile device to prevent the sharing of precise Location Information. You may also manage how your mobile device or mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings.

Opt Out from Cross-App and Cross-Site Interest-Based Advertising

Some of our advertising partners are members of the <u>Networking Advertising Initiative</u> or the <u>Digital</u> <u>Advertising Alliance</u>. Please visit these organizations' opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered

by your mobile operating system to limit ad tracking or install the DAA's AppChoices app to learn more about how you may opt out of receiving personalized ads in mobile apps.

5. Accessing and Correcting Information.

Keeping your information helps ensure that we provide you with Ads available through our business partners. You may update or correct your profile information and preferences at any time by accessing your Settings through the Service or emailing us at support@knectup.com. You may also exercise any of the rights described in Section 9 by emailing us at support@knectup.com. If you want to close your account or have other questions or requests, or if you would like to access or request a correction to any other information we hold about you, please contact us at support@knectup.com. If you wish to cancel your account, contact us at support@knectup.com. Please note that while your changes are reflected promptly in active user databases, we may retain all information you submit for as long as needed to fulfill a legitimate business need or as required by law, including for backups and archiving, prevention of fraud and abuse, compliance with legal obligations, dispute resolution, enforcing our agreements, and analytics.

6. Security of Personal Information.

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of your Personal Information. We cannot, however, ensure or warrant the security of any information you transmit to us or store on the Service.

7. Our Commitment to Children's Privacy.

Our Service is restricted to person's 18 years of age or older. We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of the Service is directed to children. If you learn that a child is using AdHub or has provided us with personal information in violation of this Privacy Policy, then you may alert us at support@knectup.com.

8. International Visitors.

The Service is hosted in the United States and is intended for visitors located within the United States. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personally identifiable information outside of those regions to the United States for storage and processing, and by providing your personally identifiable information on the Service you consent to that transfer, storage, and processing.

9. California Privacy Policy and Privacy Notice.

On January 1, 2020, California's new privacy law, the California Consumer Privacy Act of 2018 ("CCPA"), became effective. The CCPA provides broad rights to California residents regarding how their data is

collected, held, processed, licensed and sold. Residents of California now have the right, among others, to know what of their personal information is sold or disclosed to third parties, the right to access their personal information that businesses have collected, the right to opt out of the sale of their personal information, and the right to delete of all their personal information (the "right to be forgotten"). KnectUp takes data collection and privacy seriously. As such, in an effort to be transparent about KnectUp's data collection practices, and despite the fact that the CCPA only applies to California residents, the rights afforded under the CCPA are rights that any AdHub user in any state can choose to exercise. Each of these rights can be exercised by emailing us at support@knectup.com. KnectUp will respond to your request(s) within forty-five (45) days

Information We Collect

AdHub collects a variety of information that is considered Personal Information. "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information includes, but is not limited to, the following if it identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household. In particular, AdHub has collected the following categories of personal information from its consumers within the last twelve (12) months:

Categories of personal information that AdHub collects on users:

- Category: Identifiers
 - o Name
 - o Phone Number
 - o Birth Date
 - o Email Address
 - o PayPal/Venmo Account
- Category: Internet or other electronic network activity information
 - o Number of Ads viewed on AdHub

Categories of personal information that Knectup sells to third parties:

• AdHub does not sell personal information to third parties.

Categories of personal information disclosed to third parties for a business purpose:

- Category: Identifiers
 - o Email Address
 - o Phone Number
 - o PayPal/Venmo Account (provided by user for Pay with AdHub)
 - Fraud detection indicators

- Category: Internet or other electronic network activity information
 - o Mobile Device Information. Our 3rd party Ad service providers may collect certain information about your mobile device when you use our Services, including device identifier (such as the Android Advertising ID and the Apple iOS IDFA), user settings, the make, model, and operating system of your device, information about other applications installed on your device (and, if you use an Android-based mobile device, how you use them e.g., frequency and duration of use), and information about your use of our Services while using the device, such as your use of features, functions, or clicks on notifications or content. For more information, please reference AdMob Privacy & Terms https://policies.google.com/technologies/partner-sites.
- Category: Geolocation data
 - We may use AdMob optional GPS/location-based ad targeting. For more information, please reference AdMob Privacy & Terms https://policies.google.com/technologies/partner-sites.

Under the CCPA, "sell," "selling," "sale," or "sold," means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to another business or a third party for monetary or other valuable consideration.

Exercising your rights under the CCPA

To exercise any of your rights under the CCPA, please submit a verifiable request to us by email at support@knectup.com. You can submit a secure request to exercise any of your rights under the CCPA. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

Disclosures

- 1. Has KnectUp disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months?
 - a. No
- 2. Does KnectUp sell the personal information of its users or minors under the age of 16 without affirmative authorization?
 - a. No.

Right to Opt Out

KnectUp does not sell personal information to third parties. In the event this policy changes we will notify you - See section 10. At the time this policy change goes into effect, you have the right to direct

KnectUp to not sell your personal information to third parties at any time. This is referred to as your "right to opt out." Pursuant to this Privacy Policy, KnectUp has never sold your personally identifiable information and has no intention to do so in the future; KnectUp only shares information as outlined herein, and always in an anonymized and/or deidentified manner. If you choose to opt out of the sharing of your anonymized personal information, KnectUp will no longer send your anonymized and/or deidentified information to third parties. You can choose, at any time, to opt back in to the sale of your anonymized and/or deidentified personal information. To opt out of (or opt back in to) the sharing of your anonymized and/or deidentified personal information with third parties, please email us at support@knectup.com. Once you exercise your right to opt out, we will wait at least twelve (12) months before asking you to reauthorize the sale of your anonymized and/or deidentified personal information.

Right to Know

KnectUp does not sell personal information to third parties. In the event this policy changes we will notify you - See section 10. At the time this policy change goes into effect, you have the right to receive information about the types of personal information that KnectUp sells or discloses to third parties. Specifically, this right allows you to ask KnectUp (a) what are the categories of personal information that KnectUp collects about me? (b) what are the categories of my personal information that KnectUp sells to third parties? (c) what are the categories of third parties that KnectUp sells this information to? and (d) what are the categories of personal information that are disclosed to third parties for a business purpose? Each of these four questions must be answered by KnectUp when you exercise your right to know. KnectUp will disclose this information to you within 45 days of you exercising your right to know. If you choose to exercise this right, you will receive both an email confirming KnectUp's receipt of your request, and a follow-up email with the information addressing these questions. To exercise your right to know, please email us at support@knectup.com.

Right to Non-Discrimination

You have the right to non-discrimination if you exercise any of your rights under the CCPA. If you exercise your rights under the CCPA, KnectUp will not do any of the following: (a) deny you any goods or services; (b) provide to you a different level or quality of Ads or Advertising Industry learnings; or (c) suggest to you that you will receive a different return rate for Ads served on AdHub. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our service that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please email us at support@knectup.com or write us at our address listed on our webpage.

Right to Access

You have the right to request access to all the categories of personal information that KnectUp has collected about you, and all the specific pieces of personal information that KnectUp has collected

about you through your use of the AdHub app. When you exercise this right, the information that KnectUp provides to you must be in a portable and readily readable format. KnectUp will disclose this information to you within 45 days of you exercising your right to access. If you choose to exercise this right, you will receive both an email confirming KnectUp's receipt of your request, and a follow-up email with the information addressing these questions. KnectUp must also, whether you exercise your rights or not, disclose to you (a) the categories of personal information collected about you, (b) the purposes for which your personal information is used, and (c) refrain from collecting or using additional categories of personal information about you without proper notice. To exercise your right to access, please email us at support@knectup.com.

Right to be Forgotten

You have the right to request that KnectUp delete all the data it has collected about you, subject to certain exceptions for business purposes. You may exercise your right to deletion, also known as the right to be forgotten, twice in any twelve-month period. However, when you do exercise this right, please know that your user experience within the app will look different and any personalization will be lost. KnectUp will not be able to send you targeted offers for items that may be of interest to you and you may not receive personalized recommendations or emails. Also, when you exercise your right to be forgotten, any ad returns that are pending approval (if any) in your AdHub account at the time of deletion will be deleted, and you will lose those pending returns. In addition, any earnings will be reset to the amount of Ad Returns in your AdHub account at the time of deletion. For all intents and purposes, when you exercise the right to be forgotten, you will thereafter be treated as a new AdHub user. To exercise your right to be forgotten, please email us at support@knectup.com. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

• Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

10. Changes and Updates to this Privacy Policy.

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective as described in our Terms of Use. If we materially change the ways in which we use or share personal information previously collected from you through the Service, we will notify you through the Service, by email, or other communication.

11. Our Contact Information.

Please contact us with any questions or comments about this Privacy Policy, your information, our use and disclosure practices, or your consent choices by e-mail at support@knectup.com, or our mailing address:

KnectUp, LLC. 5 Mill River Ln # A105 Ardsley NY 10502 Attn: Legal Department