



## **PRIVACY POLICY**

Effective as of April 23, 2020.

This privacy policy (the “Privacy Policy”) applies to Linkibag, Inc.’s (“Linkibag,” “we,” “us,” or “our”) collection, storage, use, and disclosure of personal information that may be collected by us when you interact with Linkibag, such as when you visit or use our website, located at [www.linkibag.com](http://www.linkibag.com) (“Site”). We have created this Privacy Policy to tell you what information our Site collects, how we use that information, and who we will share that information with, if at all. This Privacy Policy does not address the privacy practices of any third parties that we do not own or control or which we are not affiliated with. Capitalized terms not defined in this Privacy Policy will have the meaning set forth in our Terms of Use. By visiting and/or using our Site, you are agreeing to the terms of this Privacy Policy and the Terms of Use accessible by visiting <https://www.linkibag.com/linkibag/page/terms>. We encourage you to read the Privacy Policy, and to use the information it contains to help you make informed decisions. **By utilizing the Site, you authorize us to collect and/or receive such information.**

This Privacy Policy will explain how we use the personal data we collect from you when you use our website.

### **Topics:**

- **Data Collection:** Information we collect or receive. How we collect your data. **How information is used. How information is shared.**
- **Cookies:** What are cookies. How we use cookies. Types of cookies we use. How to manage your cookies.
- **Third Party Advertisers:** Information collected by or through third-party advertising companies and how to opt out of third-party interest-based advertising.
- **Communication Preferences.**
- **How We Protect Your Data.**
- **External Websites.**
- **Children’s Privacy.**
- **Your Privacy Rights:** How we handle Do Not Track Signals. California Privacy Rights. Nevada Privacy Rights. Non-US Privacy Rights. Your data protection rights.
- **Changes to This Privacy Policy.**
- **Contacts:** How to contact us.

## 1. Information We Collect or Receive.

We may collect Personal Information about you directly from you and from third parties, as well as automatically through your use of our Site. In the course of operating the Site, we will collect and/or receive the following types of information:

- (a) *Personal Information.* We only receive or collect information that identifies you personally (“Personal Information”) if you choose to provide such personally identifiable information to us via registration, email, or other means. When you sign up to become a user or contact us, you will be required to provide us with Personal Information about yourself. This Personal Information may include your name, the company or organization you are affiliated with, date of birth, e-mail address, physical address, photo, and phone number. We do not collect any of your Personal Information when you use the Site unless you voluntarily provide us with the information.
- (b) *Third-Party Log In.* There may be an option to sign in through a third-party. If you sign in through Google, you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you agreed that Google would provide to us through Google’s Application Programming Interface (“API”). Such information may include, without limitation, your first and last name, Google username, Google profile picture, headline, unique identifier and access token, and e-mail address. If you register or visit the Site through Facebook Connect or another social media website, you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you agreed that the social media website would provide to us through its API. We do not receive or store your passwords for your social media accounts. If you interact with social media widgets, share content using social media share buttons, or access features of the Site that contains content or features provided by social media platforms, the relevant social media platforms may collect information. We encourage you to review the privacy policies of the social media platforms that you engage with as we are not responsible for their privacy practices.
- (c) *Payment Information.* If you choose to make a purchase or subscribe to a feature or service of ours that requires a fee, you will be required to provide us with your payment information, including, without limitation, bank account numbers, credit card or debit card numbers, account details, Automated Clearing House (ACH) information, and similar data (“Payment Information”). Your Payment Information will be collected and processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use, and we do not obtain access to any of your Payment Information in connection with such purchases and interactions.
- (d) *Geolocational Information.* Certain features and functionalities of the Site are based on your location. In order to provide these features and functionalities while you are using your mobile device and/or computer, we may, with your consent, automatically collect geolocational information from your mobile device or wireless carrier and/or certain third-party service providers (collectively, “Geolocational Information”). Collection of your Geolocational Information occurs only when the Site is running on your device. You may decline to allow us to collect such Geolocational Information, in which case we will not be able to provide certain features or functionalities to you.

- (e) *Third-Party Analytics.* We and the third-party technology providers, ad exchanges, ad networks, advertisers, agencies, ad exchanges, and ad servers with which we work use third-party analytics services (e.g., Google Analytics) to evaluate your use of the Site, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Site and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on Google Analytics, and how it collects and processes data, go to the site “How Google uses data when you use our partners’ site or apps”, (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), or any other URL Google may provide from time to time). For more information on these third parties, including how to opt out from certain data collection, please go to section 9 “Information Collected by or Through Third-Party Advertisers”, or visit <https://www.linkibag.com/linkibag/page/policy>. Please be advised that if you opt out of any such service, you may not be able to use the full functionality of the Site.
- (f) *Other Information.* In addition to the Personal Information, Payment Information, and Geolocation Information, we may automatically collect or receive additional information regarding you and your use of the Site; your interactions with us and our advertising; and information regarding your computer and mobile devices used to access the Site. Such other information may include:
  - (i) From You. Additional information about yourself that you voluntarily provide to us, such as your age, a username and password, country, state, zip code, and your product and service preferences.
  - (ii) From Your Activity. We may collect or receive information regarding: your IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device; browser type and language; referring and exit pages and URLs; date and time of your activity; and details regarding your activity on the Site, such as search queries and other performance and usage data.
  - (iii) About Your Mobile Device. We may collect or receive information regarding: the type of mobile device you are using; advertising Identifier (“IDFA” or “AdID”); the operating system and version (e.g., iOS, Android or Windows); your carrier; and the network type being utilized (WiFi, 3G, 4G, LTE).

## 2. How We Collect Your Data.

You directly provide us with most of the data we collect. We collect data and process data when you:

- (a) *Registration.* When you register with us through the Site or become a Linkibag member through the Site to send links to other members, we will ask you for certain Personal Information. Your Payment Information, such as a credit card number or billing information, is collected by our third-party payment processor on our behalf.
- (b) *Communications.* If you contact us directly, we will collect your name, contact details, the content, date and time of your message and any attachments thereto, and other information you may directly provide to us. You may choose to submit your email address and phone number on our Site to receive our updates. You may also provide us with your reviews of our services or complete surveys regarding our services.

- (c) *Administration and Personalization of Your Profile.* We may collect any Personal Information you provide to us as part of the administration and personalization of your Linkibag account profile. You may voluntarily provide us with information about yourself so that we can personalize your interactions with our Site.
- (d) *Online Usage Data and Property Usage Data.* We may automatically collect the following information about your use of our Site through: cookies, web beacons, and similar technologies: your domain name; browser type; operating system type, name and version; page views; links you click; your IP address; location information; the length of time you visit or use our Site; referring URL; access date and time; mobile device ID; language information; device name and model; and other information about your activities within the services and communications that we send you. Please see the sections listed under the “Cookies” topic and the section labeled “Information Collected by or Through Third-Party Advertisers” below for more information. Where required under applicable law, we will only perform such data collection with your consent.

We may also receive your data indirectly from the following sources: Paypal, iPage, Mailchimp, and Google Analytics as mentioned in this Privacy Policy.

### **3. How Information is Used.**

We collect your data so that we can provide our services and enable you to access and use the Site. We collect your data to improve our overall Site, and your experience with our Site (such as making suggestions, and ranking search results). Information you provide helps us respond to your customer service requests and support needs more efficiently. We may use information in the aggregate to understand how our users as a group and as an individual use the services and resources provided on our Site. We use the data we collect to email you with special offers on other services we think you might like and administer our promotional programs. We solicit your feedback and provide you with customer services based on the data we collect. We may use your email address to send your user information and updates pertaining to your order. It may also be used to respond to your inquiries, questions, and/or other requests. If you decide to opt-in to our mailing list, you will receive emails that may include company news, updates, related product or service information, and /or updates, information and advertisements from our partners, etc. If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email. We also use your data to comply with our legal obligations and ensure compliance with Linkibag Policies (such as verifying information or identifications provided by you, resolve disputes, enforce our Terms of Service and other policies, conduct security investigations and risk assessments, and detecting or preventing fraud and other harmful activity).

### **4. How Information is Shared.**

- (a) In order to provide our services and administer our promotional programs, we may share your information with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
- (b) We engage third-party companies and individuals to perform functions on our behalf. Examples include providing technical assistance, customer service, marketing assistance, and administration of promotional programs. These other companies will have access to the information only as necessary to perform their functions and to the extent permitted by law.

- (c) In an ongoing effort to better understand our users, the Site, and our products and services, we analyze certain information in anonymized and aggregate form to operate, maintain, manage, and improve the Site, and/or such products and services. This aggregate information does not identify you personally. We may share and/or license this aggregate data to our affiliates, agents, business and promotional partners, and other third parties. We may also disclose aggregated user statistics to describe the Site, and these products and services to current and prospective business partners and investors and to other third parties for other lawful purposes.
- (d) We may share some or all of your information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- (e) As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the information may be part of the transferred assets.
- (f) To the extent permitted by law, we may also disclose the information:
  - (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or
  - (ii) whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of us or others, including you.

## **5. What are Cookies?**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **6. How We Use Cookies.**

We use cookies in a range of ways to improve your experience on our Site, including: keeping you signed in; understanding how you use our Site and to personalize your experience with the Site; identifying the type of device you are using; analyzing which portions of the Site are visited and used most frequently; and measuring and optimizing advertising and promotional effectiveness.

## **7. Types of Cookies We Use.**

There are a number of different types of cookies, however, our Site uses the cookies listed below.

We use session cookies, which expire once you close the Site, and persistent cookies, which stay on your mobile device or computer until you delete them and other technologies to help us collect data and to enhance your experience with the Site.

We use functionality cookies so that we recognize you on our Site and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

We use advertising cookies to collect information about your visit to our Site, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our Site.

## **8. How to Manage Cookies.**

If you do not want us to deploy cookies in the Site, you can opt out by setting your mobile device or computer to reject cookies. You can still use the Site if you choose to disable cookies, although your ability to use some of the features may be affected.

## **9. Information Collected by or Through Third-Party Advertising Companies.**

We may share information about your activity on the Site with third parties for ad distribution and ad optimization (defined as the tailoring, targeting (i.e., behavioral, contextual, retargeting, analyzing, managing, reporting, and optimizing of ads)). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data.

## **10. How to Opt Out of Third-Party Interest-Based Advertising.**

If you wish to opt out of third-party interest-based advertising, please visit <http://www.networkadvertising.org> for details on how to do so. You may opt out of the automated collection of information by third-party ad networks for the purpose of delivering advertisements tailored to your interests by visiting the consumer opt-out page for the Self-Regulatory Principles for Online Behavioral Advertising at <http://www.aboutads.info/choices/> and edit or opt-out your Google Display Network ads' preferences at <http://www.google.com/ads/preferences/>. Because those opt-out and preference control pages are specific to the individual browser used to visit it, and because that page is not operated by us, we are unable to perform the opt-outs on your behalf. Additionally, users of mobile devices can limit ad tracking by accessing any settings offered by your mobile operating system.

## **11. Communication Preferences.**

If you have provided us any Personal Information, you may access, remove, review, and/or make changes to the same by contacting us as set forth below. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any of our marketing e-mails. You should be aware that it is not always possible to completely remove or modify information in our subscription databases. You cannot opt out of receiving transactional e-mails related to the Site (e.g., requests for support).

We may also deliver notifications to your mobile device or computer (e.g., push notifications). You can disable these notifications by deleting the relevant service or by changing the settings on your mobile device or computer.

## **12. How We Protect Your Information.**

We take commercially reasonable steps to protect your data and information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We securely store your data with a cloud host. All of our servers are encrypted, with a standard process for data deletion. Sensitive data such as your passwords are stored as hashed values. We take measures to delete your Personal Information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of services requested by or provided to you, the nature and length of our relationship with

you, possible re-enrollment with our services, the impact on the services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that your information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mails sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored “personal data” (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on the Site in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

### **13. External Websites.**

The Site may contain links to third-party websites. We have no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

### **14. Children’s Privacy.**

The Site is not directed to users under the age of 18. We adhere to the Children’s Online Privacy Protection Act (COPPA) and will not knowingly collect Personal Information from any user under the age of 18. We ask that minors not use the Site. For more information about the Children’s Online Privacy Protection Act (COPPA), please visit [www.ftc.gov](http://www.ftc.gov).

### **15. How We Handle Do Not Track Signals.**

We do not honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place.

### **16. California Privacy Rights.**

Under the California Consumer Privacy Act, California residents who have an established business relationship with us may choose to opt out of our sharing their contact information with third parties for direct marketing purposes. If you are a California resident and you wish to opt out, please send an e-mail to [info@linkibag.com](mailto:info@linkibag.com). California residents who are our users in California now have the right to see a report summarizing all of their personal data that we have collected and to request the removal of their data from our computer systems.

California law permits members who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their Personal Information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those third parties. See the “Contact Us” section for where to send such requests. Linkibag does not share Personal Information with third parties for their own direct marketing purposes without your prior consent. Accordingly, you can prevent disclosure of your Personal Information to third parties for their direct marketing purposes by withholding consent.

Effective January 1, 2020, the California Consumer Privacy Act (CCPA) allows California residents, upon a verifiable consumer request, to request that a business that collects consumers’ Personal Information to give consumers access, in a portable and (if technically feasible) readily usable form,

to the specific pieces and categories of Personal Information that the business has collected about the consumer, the categories of sources for that information, the business or commercial purposes or collecting the information, and the categories of third parties with which the information was shared. California residents also have the right to submit a request for deletion of information under certain circumstances. Consistent with California law, if you choose to exercise your rights, we won't charge you different prices or provide different quality of services unless those differences are related to your information. Please note that you must verify your identity and request before further action is taken. As a part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a 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.

Users can visit our Site anonymously. We do not sell your Personal Information to third parties. We do allow third parties to collect certain Personal Information through our services and share Personal Information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our Site and elsewhere based on users' online activities over time and across different sites, services, and devices.

**Notice to California Minors.** If you are a California resident under 18 years old and a registered user, you can request that we remove content or information that you have posted to our Site or other online services. Note that fulfillment of the request may not ensure complete or comprehensive removal (e.g. if the content has been reposted by another user). To request removal of content or information, please email [questions@linkibag.com](mailto:questions@linkibag.com) or call (224) 255-7737.

#### **17. Nevada Privacy Rights.**

Linkibag does not sell your Personal Information. However, we believe it is important that you are aware you have the right to opt-out of the sale of your Personal Information. Access requests may be made directly to [questions@linkibag.com](mailto:questions@linkibag.com).

#### **18. Important Notices to Non-U.S. Residents.**

The Site and its servers are operated in the United States. The Site is not intended for users outside of the United States. If you are located outside of the United States, please be aware that your information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Site, you hereby consent to such transfer, processing, and use in the United States and elsewhere. We use your Personal Information if we have:

- (a) *Consent.* You have consented to the use of your Personal Information, for example for marketing purposes or to track your online activities via cookies and similar technologies.
- (b) *Contract.* We need your Personal Information to provide you with our services, for example for account registration and management or to respond to your inquiries.
- (c) *Legal Obligation.* We have a legal obligation to use your Personal Information, for example to comply with tax and accounting obligations, or anti-terrorism laws.



- (d) *Legitimate interest.* We or a third party have a legitimate interest in using your Personal Information. In particular, we have a legitimate interest in using your Personal Information for product development and internal analytics purposes, and otherwise to improve the safety, security, and performance of our services. We only rely on our or a third party's legitimate interests to process your Personal Information when these interests are not overridden by your rights and interests.

## 19. Your Data Protection Rights.

We would like to make sure 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.

**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 we complete 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 will respond to you within thirty (30) days.** If you would like to exercise any of these rights, please don't hesitate to contact us.

**Email us at:** [info@linkibag.com](mailto:info@linkibag.com)

**Call us at:** (224) 255-7737

**Mail Stop:** 8926 N. Greenwood Ave, Suite 220, Niles, IL 60714.

## 20. Changes to This Privacy Policy.

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Any such changes will be posted on the Site. By accessing the Site after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

## 21. How to Contact Us.

If you have questions about this Privacy Policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us. If you choose to e-mail us, please write "Privacy Policy" in the subject line. You may contact us through the following:

**Email us at:** [info@linkibag.com](mailto:info@linkibag.com)

**Call us at:** (224) 255-7737

**Mail Stop:** 8926 N. Greenwood Ave, Suite 220, Niles, IL 60714.

