



GoBubble Privacy Policy

Privacy Policy

At GoBubble Ltd ("GoBubble," "we," "us," "our"), we know you care about how your personal information is used and shared, and we take your privacy seriously. Please read on to learn more about our Privacy Policy. By visiting GoBubble's website(s) and all other products, services and applications made available by GoBubble from time to time, such as, but not limited to GoBubble Family, GoBubble Community, and GoBubble Enterprise (collectively, the "Services"), you acknowledge that you accept the practices and policies outlined in this Privacy Policy. By using the Services, you are consenting to have your personal data transferred to and processed in the United States.

GoBubble complies with all applicable laws regarding your privacy. Individuals from the European Union ("EU"), European Economic Area ("EEA") or United Kingdom ("UK") may only use our Services after providing your freely given, informed consent for GoBubble to collect, transfer, store, and share your Personal Data, as that term is defined in the EU's General Data Protection Regulation. EU, EEA or UK residents may grant that consent directly to GoBubble, or to the entity that provided you with GoBubble Community or GoBubble Enterprise.

Go Bubble Ltd ("GoBubble", "Go Bubble", "we" or "us") takes protecting your personal information and privacy seriously and we comply with all applicable data protection laws. The relevant data protection law will those relating to your country of residence. In general, our privacy protections are built to comply with the General Data Protection Regulation ("GDPR"), which came into force on 25 May 2018 and enhances your rights in respect of any personal information you share with us or that we collect about you. We apply these protections across our users across the globe. Other additional data protection laws may also govern our practices. For example, if you are a resident of the United Kingdom we comply with and your rights are also protected by the Data Protection Act 2018. If you reside in the United States, we comply with and your rights are protected by US federal law and the law of the various states. If you reside in Australia, we comply with the Privacy Act 1988, as amended periodically.

This Privacy Policy sets out how we collect and look after your personal information when you interact with us and your rights in relation to the manner in which we use your personal information. Please read this Privacy Policy carefully so you understand how we may use your personal information.

You should also make sure you read additional privacy notices (if any) that we may provide in certain specific situations, for example if you become a client or employee of GoBubble.

All capitalized terms that are not defined in this Privacy Policy shall have the meaning given to them in the Terms of Use.

In this Privacy Policy, "Personal Information" means any information about an identifiable individual or information that can be used to identify an individual, and includes "Personal Data" as that term is defined under the GDPR.

What this is saying

Your privacy is very important to us. This policy tells you how your Personal Information is used when you use GoBubble's Services. By using GoBubble, you acknowledge that you have read and accepted these policies.

GoBubble products are designed to reduce the receipt by you, your family, and your entity, of disfavored content online, particularly sent through various social media.

You are responsible for any Content you provide in connection with the Services. We cannot control the actions of anyone with whom you or any other GoBubble users may choose to share information. Therefore, we cannot and do not guarantee that Content you or any user posts on the Services will not be viewed by unauthorized persons. Although we may allow our users to set privacy options that limit access to certain parts of the Services, please be aware that no security measures are perfect or impenetrable and that we are not responsible for circumvention of any security measures contained on the Services. GoBubble does not encourage you to make any personally identifiable information (Personal Information) public other than what is necessary for you to use our Services. You understand and acknowledge that, even after removal, copies of Content may remain viewable in cached pages, archives and storage backups or if

other users have copied or stored your Content. We will make efforts to remove the Content under our control that is not part of another user's account.

You may request removal of Personal Information (as described below) that you have provided to us by contacting us at privacy@gobubblewrap.com. We will remove your Personal Information from our database on your request, but this information may remain in our server logs as part of our standard backup procedures, unless prohibited by contract or law. An Organizer, as that term is defined in our Terms of Use, may be able to upload and provide information about you to your account; if you would like to remove or amend that information, you may have to contact and work directly with that Organizer.

Any improper collection or misuse of Content or other information accessible on the Services is a violation of GoBubble Terms of Use and should be reported to privacy@gobubblewrap.com.

How may I exercise my privacy rights as a resident of the EU, EEA, Switzerland or the UK who uses GoBubble?

GoBubble complies with the EU GDPR and the UK Information Protection Act 2018 and makes it easy for EU, EEA, Swiss or UK residents to exercise their rights described in that regulation. The purposes for which GoBubble collects your Personal Data, the categories and specific types of Personal Data we collect, and our practices and policies regarding your Personal Data are described in this Privacy Policy. As discussed throughout this Privacy Policy, GoBubble makes it easy for you to access, correct, delete, or demand deletion of your Personal Data. You may object to our processing of your Personal data by emailing us, although if you prohibit our processing, it may make some of our Services either impossible to offer or less useful. Any of those requests should be sent to privacy@gobubblewrap.com. Should you ever wish to leave GoBubble and take an electronic copy of the Personal Data and information we have collected about you, you may make that request at privacy@gobubblewrap.com. In addition to contacting our Data Protection Officer, EU individuals may contact the Data Protection Authority of The Republic of Ireland at info@dataprotection.ie, and UK individuals may contact the Information Commissioner's Office by live chat at

<https://ico.org.uk/global/contact-us/> to raise concerns about GoBubble's implementation of GDPR, the UK Information Protection Act 2018, or GoBubble's facilitation of the exercising of your privacy rights.

How does GoBubble protect my privacy rights as a European Union, European Economic Area, Swiss, or United Kingdom Individual?

GoBubble complies with all applicable privacy laws and regulations that apply to individuals of the EU, EEA, Switzerland, or the UK. GoBubble may lawfully transfer EU, EEA, UK or Swiss individuals' Personal Data, as that term is defined in the EU's General Data Protection Regulation ("GDPR").

What does this privacy policy cover?

This Privacy Policy explains how GoBubble collects, uses and discloses information from you and other users who access or use the Services, including our treatment of Personal Information. Also, this Privacy Policy covers GoBubble's treatment of any Personal Information that our partners share with us, or that you provide to GoBubble through another third party website or service while using the Services. This policy does not apply to websites, services or practices of companies that we do not own or control, even if they help us operate our Services. Third party providers who do help us operate our Services must adhere to privacy and security obligations in a manner consistent with GoBubble's policies and practices.

What this is saying

Here is what this policy covers: all information that you provide to us and that we collect while you are using GoBubble. This policy does not cover third party companies that we do not control but who help us operate our service. Those third party companies must adhere to privacy and security obligations in a manner consistent with GoBubbles policies and practices. Keep reading, there is more about this later!

What information does GoBubble display or collect?

When you use the Services, you may set up your account and transmit information through various channels and third party services as permitted by the functionality of the Services. GoBubble will not display your personal contact information to other users, without your permission. If, however, you utilize GoBubble through GoBubble Community or GoBubble Enterprise, we will share your personal contact information with Organizers, as that term is defined in our Terms of Use. The information we gather from Participants enables us to attempt to verify user identity, allows our users to set up a user account and profile through the Services, and helps us personalize and improve our Services. We retain this information to provide the Services to you and our other users and to provide a useful user experience.

Information you provide to us

We receive and store any information you knowingly enter on the Services, whether via computer, mobile phone, other wireless device, or that you provide to us in any other way. With your express consent, you may be able to upload, import or sync contact information from your mobile device (for example, from your address book) to GoBubble. This information may include Personal Information such as: your name, your user name, password, phone numbers, email addresses, photographs, and, in certain circumstances, your school and/or district, video that may contain your voice and image, club, team or Organization or Enterprise affiliation (which may be used to validate your account or to provide you with notifications via the Services from a teacher, school and/or district, class, group, club, team or affiliated Organization or Enterprise ("Notifications"), or any other information necessary for us to provide our Services. You may choose not to provide us with certain information, but then you may not be able to take advantage of many of our features. We use the Personal Information we receive about you to provide you with the Services and also for purposes such as:

- attempting to authenticate your identity,
- responding to your requests for certain information,
- customizing the features that we make available to you, including and especially content moderation on third party sites,
- suggesting relevant services or products for you to use,

- improving the Services and internal operations (including troubleshooting, testing, and analyzing usage),
- communicating with you about new features
- and, most importantly, protecting our users, sending emergency messages we are directed to send to you, and working towards making sure our Services are safer and more secure.

You may modify or remove your Personal Information at any time by logging into your account. If an Organizer uploads or adds information about you to your account, you may have to contact and work directly with that Organizer in order to modify or remove that information.

The information you provide to GoBubble is also used to analyze usage and improve our products and services. We do not show or share your Personal Information without your permission except in the few circumstances described here. We may also review account information to protect the safety of our community.

Information collected automatically

We receive and store certain types of information whenever you use the Services. GoBubble automatically receives and records information on our server logs from your browser including GoBubble cookie information, the page you requested, and other usage information such as your activity on the Services, the numbers and frequency of visitors to our site and its components (similar to TV ratings that indicate how many people watched a particular show). None of this information constitutes Personal Information. Certain information that is collected automatically, such as device ID, IP address, session information, and browsing information that is associated with a user will be treated as Personal Information.

We also may provide to our partners aggregate information derived from automatically collected information about how our users, collectively, use our Services. We may share this type of non-personally identifiable, aggregated statistical data so that our partners also understand how often people use their services as well as our Services.

What this is saying

There is certain information that we gather automatically when you use GoBubble, such as navigation and cookie information. Some of this information is collected and used in an aggregate and anonymized way to help improve our service. If Personal Information is included, we treat it carefully like all other Personal Information.

What about cookies, pixels, and local storage?

Cookies are small files that websites place on your computer as you browse the web. Like many websites, GoBubble uses cookies to discover how people are using our Services and to make them work better.

A pixel is a small amount of code on a web page or in an email notification. As many services do, we (or our agents) may use pixels to learn whether you've interacted with certain web or email content on our Services. This helps us measure and improve our Services and personalize your experience on GoBubble.

Local storage is an industry-standard technology that allows a website or application to store information locally on your computer or mobile device. We use local storage to customize what we show you based on your past interactions with Gobubble.

GoBubble uses these technologies to deliver, measure, and improve our Services in various ways. These uses generally fall into one of the following categories:

Authentication and security

- To log you into GoBubble.
- To protect your security.
- To help us detect and fight spam, abuse, and other activities that violate GoBubble's policies.

For example, these technologies help authenticate your access to GoBubble and prevent unauthorized parties from accessing your account.

Preferences

To remember information about your browser and your preferences.

For example, cookies may help us remember your preferred language or country that you are in. We can then provide you with GoBubble content in your preferred language without having to ask you each time you visit GoBubble. We can also customize content based on your country, such as disabling SMS, or to withhold certain content based on applicable local laws.

Analytics and research

To help us improve and understand how people use our Services.

For example, cookies help us test different versions of our services to see which particular features or content users prefer or to share information about our services to you as you interact online across the internet. We might also optimize and improve your experience on GoBubble by using cookies to see how you interact with our services, such as when and how often you use them and what links you click on.

Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. Note that the use of cookies by anyone other than GoBubble is not covered by our privacy policy. We do not have access or control over those cookies.

What will we use your personal information for?

Your personal information may be used for the purposes specified in this Policy and, in particular, we may use your personal information for the following purposes:

- Providing our Services to you (or acquiring goods and services from you) and others and communicating with you in general.

- Analysing and improving our services and activities (including our website).
- Considering, evaluating and reporting on the social and environmental impact of our work.
- Undertaking research -- exclusively using anonymized personal information -- to produce reports and insights to further advance online safety for those using our services and to share reports of the conclusions of that research with organizations and corporations working with children to further enhance online safety on their sites and services.
- Providing you with further information about our business, aims and impact, services or activities (subject to any requirements to obtain your consent to receive such information).
- Operating our website in an effective and secure manner, aiming to create a high-quality user experience and presenting content effectively and appropriately for you.
- Satisfying our legal obligations, for example in relation to payment of taxes and employment law.

Data Retention

We will retain your personal data only for as long as needed for the purposes we collected or processed it for, including for the purposes of satisfying any contractual, legal, accounting, reporting or taxation requirements. To calculate the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes in any other way, as well as applicable legal requirements.

How is children's Personal Information treated?

GoBubble complies with all laws and regulations regarding the personal information of minors, including, but not limited to the United Kingdom's Age Appropriate Design Code, the European Union's General Data Protection Regulation, and the United States' Children's Online Privacy and Protection Act ("COPPA").

Residents of the United Kingdom

GoBubble complies with the Age Appropriate Design Code and the General Data Protection Regulation. If you are younger than 16 years of age before using GoBubble we must obtain the consent of your parent or guardian to collect, process, share, store, or use your personal data.

Residents of the European Union

GoBubble strictly complies with the European Union's General Data Protection Regulation. GDPR requires that GoBubble obtain the consent of a parent or guardian prior to the collection, processing, sharing, storing, or use of data of minors. Each country in the EU has determined the age of minors below which consent is required and GoBubble strictly complies with these requirements.

Residents of the United States

COPPA requires that online service providers obtain parental consent and provide notice before they knowingly collect personally identifiable information online from children who are younger than 13 years of age ("under-13 users"). GoBubble typically relies on a school, school district, club, association, organization, or corporation to obtain Verifiable Parental Consent to provide our services to under-13 users. Pursuant to COPPA, we may collect an under-13 user's name (first name and last initial), date of birth, email address and/or telephone number in order to operate and provide the Services, and we may collect the under-13 user's parent's (or legal guardian's) email address in order to provide notice to the child's parent or guardian that we may contact the under-13 Participant for the purpose of allowing access to and use of the Services. If GoBubble does not receive Verifiable Parental Consent within a reasonable time period, the under-13 account and his/her Personal Information will be deleted. If an under-13 Participant's account is inactive for at least twelve months, GoBubble's policy is to delete the Personal Information. If we learn we have collected Personal Information from an under-13 Participant other than pursuant to the above, or if we learn that an under-13 Participant has provided us Personal Information beyond what we request from him or her, we will delete that information as quickly as possible after we have identified it. If you believe that an under-13 Participant may have provided us Personal Information in violation of this paragraph, please contact us at privacy@gobubblewrap.com.

In order for an under-13 user to gain access to additional features or services, GoBubble may employ one or more methods approved by the Federal Trade Commission for verifying parental consent.

While COPPA requires GoBubble to follow these procedures for under-13 users in the United States, GoBubble employs the same process to obtain consent for all users under 13 years old.

What happens when I associate my account with a GoBubble Community or GoBubble Enterprise?

Users may have the choice of associating their account with a Community or Enterprise through GoBubble, such as a school, team, sports league, association, group, or company). This may be required (for example) for employees by an employer and may be either required or strongly encouraged for other types of Organizers in order to use certain features of the Services. Other users may attend a school or school district that contracts with GoBubble for use of our Services, and this may automatically create an account for all the students, teachers, parents and relevant administrators of that class, school, or district and associate their accounts with the class, school, or district.

By associating your account with an Organization, you acknowledge and agree that an Organizer may be able to view your User Submissions (including your Personal Information and messaging content). In addition, Organizers may be able to make administrative changes to your account.

Will GoBubble share any of the Personal Information it receives?

GoBubble relies on its Participants to provide accurate Personal Information in order to provide our Services. We try our best to protect that information and make sure that we are responsible in handling, disclosing, and retaining your data. We neither rent nor sell your Personal Information to anyone. If other GoBubble users, other individuals or companies whose products you choose to use, have access to your Personal

Information (for example, your messaging content), they may use and share that information in ways that GoBubble cannot, and does not, control. GoBubble shares your Personal Information in personally identifiable form as described below.

Business transfers

If GoBubble (or substantially all of its assets) is acquired by another company, user information may be one of the assets transferred to or acquired by that company. You acknowledge that such a transfer may occur, and that any acquirer of GoBubble may continue to use your Personal Information as set forth in this policy. You will be notified via email or some other means of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information (including the right to delete your information). If GoBubble goes out of business without a successor, GoBubble would delete your information..

Protection of GoBubble and others

We may release Personal Information when we believe in good faith that release is necessary to:

- comply with the law or national security request (for example, responding to a subpoena or other legal process);
- enforce or apply our Terms of Use and other agreements; or
- protect the rights, property, or safety of GoBubble, our employees, our users, or others. This includes, without limitation, exchanging information with other companies and organizations for fraud protection or responding to government requests.

We also may be required to disclose an individual's Personal Information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

With your consent

You will be notified when your Personal Information may be shared with agents or companies other than GoBubble or the entity that established your GoBubble account on your behalf and you will be given the option to prevent the sharing of this information unless GoBubble determines that not disclosing this to you prior to your information being shared is necessary to comply with applicable laws or legal processes or we are prohibited by law or legal processes from informing you in advance.

What this is saying

If there is any other reason we need to share your Personal Information (other than for legal reasons), we will get your consent first.

Is information about me secure?

The security of Personal Information in the school environment is a top priority for GoBubble.

GoBubble has protections in place to enhance our users' security, and routinely update these protections. We have administrative, technical, and physical safeguards designed to protect against unauthorized use, disclosure of or access to Personal Information. GoBubble endeavors to protect user information and to ensure that user account information is kept private; however, we cannot guarantee the security of user account information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. If GoBubble knows or becomes aware of a security breach of its users' personally identifiable information, GoBubble will notify affected users as required by applicable laws and may post a notice on the Services as required by applicable law(s).

The Services contain links to other sites or services. GoBubble is not responsible for the privacy policies and/or practices on other sites. When linking to another site you should read the privacy policy stated on that site. This Privacy Policy only governs information collected on the Services.

What this is saying

The security of your Personal Information is extremely important to us and we take measures internally to make sure your information is safe with us. We routinely update our security features and implement new protections for your data. If we learn that your data was breached, we will notify you as soon as possible so you can take actions to protect your data.

Third party services

You may be able to access certain third party products through GoBubble's Services to share content to or from another website or app. These are not GoBubble products; they are another company's and we do not control their privacy and security practices so only you can decide whether to connect your GoBubble account with another company's services.

What information can I access and modify?

GoBubble acknowledges that individuals from the EU, EEA, UK and various states in the United States have the right to access the Personal Information that we maintain about them. Any individual who seeks access to, or who seeks to correct, amend, or delete inaccurate data, or to port their data to another, similar service should direct their query to privacy@gobubblewrap.com. If requested to remove data, we will respond within a reasonable timeframe.

You also have the right to request access to the Personal Information we hold about you in order to verify the Personal Information we have collected in respect of you and to have a general account of our uses of that Personal Information. Upon receipt of your written request to our Privacy Team (contact information below), GoBubble will provide you with a copy of your Personal Information although in certain limited circumstances, we may not be able to make all relevant Personal Information available to you such as where that information also pertains to another individual or as otherwise required or permitted by law. In such circumstances We will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

How do I delete my account?

You may request deletion of your GoBubble account by accessing your account online or contacting us at privacy@gobubblewrap.com. Note, if you are a Participant or Organizer and you request to delete your account, GoBubble may notify the Organization or Enterprise. Please note that certain information may remain in our records, server logs and archives after deletion of your account. GoBubble retains this information for purposes such as diagnosing problems with the service and for auditing legal investigations, but reserves the right to delete this information in accordance with its standard business practices in effect from time to time. Further, information and other content you have provided may remain visible elsewhere to the extent such content was copied or stored by other users.

California Residents - Exercise of Rights

If you reside in California you are entitled to exercise certain rights outlined in the California Consumer Protection Act. You may access the information we collect about you, modify it or delete it by contacting us at privacy@gobubblewrap.com. GoBubble will not and may not discriminate against you for exercising these rights.

Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by email (using the e-mail address specified in your account) or some other means prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

If we make material changes to the types of Personal Information we collect or how we use Personal Information collected from under-13 users we will notify parents by email in order to obtain consent for the new uses of the child's Personal Information.

Questions or concerns

If you have any questions or concerns regarding privacy when using GoBubble's Services, please contact us and send us a detailed message at the contact information below. We will make every effort to resolve your concerns.

Contact Information. You may contact GoBubble at:

GoBubble Ltd, Suite G233, Regus House, Chester Business Park, Chester, CH4 9QR

privacy@gobubblewrap.com

+441244 621872

What this is saying

We encourage you to contact us using the information provided here if you have any questions or concerns about how we use your information.

You have the right to complain about us or the way we have processed your personal information to the UK's data protection supervisory authority, the Information Commissioner's Office (www.ico.org.uk) or the data protection authority of your country of residence. However, we would welcome the chance to address your concerns swiftly and properly before you contact the Information Commissioner's Office, so please consider contacting us in the first instance via privacy@gobubblewrap.com

How to Contact Us:

If you have any questions or concerns about this Privacy Notice or Cookies Policy. Please contact us via privacy@gobubblewrap.com and please mark the message for the attention of the Data Protection Officer, Chief Operating Officer.

Effective date March 9, 2022

