

# LEADMOB

## PRIVACY POLICY

This Privacy Policy is an integral part of the General Terms and Conditions (“Terms”) placed on [www.leadmob.io](http://www.leadmob.io) (“Site”) and describes how the Company collects, uses, and discloses obtained certain personal information on the Site and LEADMobPlatform.

### INFORMATION COLLECTED

When you visit the Site, you may provide us with two types of information: personal information that you voluntarily disclose that is collected on an individual basis; and non-personal information collected automatically when you use the Site or the services available on the Site (collectively, the "Information").

We do not knowingly collect any personal information from children under the age of sixteen. If you are under 16, please do not give us any personal information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our privacy policy by instructing their children never to provide personal information to us without their permission. If you have reason to believe that a child under the age of 16 has provided personal information to us, please contact us at [privacy@leadmob.io](mailto:privacy@leadmob.io), and we will strive to delete that information from our databases.

### Personal Information

Personal information is information that either identifies an individual or relates to a specific individual, and includes without limitation, a person’s name, physical address, telephone number, email, company affiliation, and in some jurisdictions an IP address.

The Site processes or uses the following personal data:

- first name, last name, username, password, email address, postal address, "wallet" address, contact details, ID data.
- other data that you have provided while contacting us, especially using the contact forms on the Site.

By providing us with your personal information, you also consent for us to collect, hold, use and disclose your personal information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with us through e-mail or through the "contact" section of our Site, we may retain, use and disclose the content of your messages together with your e-mail address and our responses.

### Non-personal Information

Non-personal information is information that does not reveal a person’s specific identity or relates to a specific individual and may include electronic interaction information, geographic or geo-location information, device information, telemetry information, statistical and aggregated information. While statistical and aggregated information may be derived from personal information we will anonymize any personal information prior to sharing this information with third parties. The Company, through IP tracking and the use of cookies and pixel tags, collects anonymous usage statistics. These are industry standard technologies used by many major websites. No personally identifiable information is collected or used in this process. Information that is collected may include: session data, geography, browser information, IP Address, operating system type, content preferences, Site usage behavior and frequency.

## Types of Cookies

The Site uses "cookies" to help you personalize your online experience. A cookie is an identifier, which is stored on your device by your browser, if your browser is configured to do so. Most browsers can be configured to reject cookies or to inform you, when a cookie is stored. By using cookies, the Site collects, processes, and uses your personal data in pseudonymous form for promotional and market research purposes and to adjust the Site to your interests (unless you have opted out of this), for displaying or sending you - if applicable with your consent - information about us and to keep you updated about our products and services that might be of interest to you. Based on this technology we might get reports from our service providers that include references to personal or aggregated data. Aggregated data might include data like general demographic or usage characteristics describing the visitors of our Site.

You may find the following cookies that are used on the Site: (i) the required cookies which enable the navigation and basic functionality of the Site, e.g. access to protected areas of the Site; (ii) the functional cookies allow to analyze your Site usage and your selections on the Site (e.g. your login name, language, or region), so we can remember these settings and to offer you a more personal experience on the Site; these cookies can also be used to remember settings like font size, font style and other configurations that you have chosen on the Site; (iii) advertising cookies with their related services help us to analyze and monitor the effectiveness of our marketing activities. In some cases we make use of third-party service providers to track and analyze statistical information about the usage and scope of content that is used by individual users of the Site. This might result in cookies being set by the service providers to track the performance of our advertisement. These cookies might, for example store information about the browsers that have been used to visit the Site. The information provided to third-party providers by us does not include personal information, but the collected information might be linked with other personal information gathered elsewhere.

You can configure your browser to prevent the storage of these above cookies. Please note in some cases it may reduce the functionality offered by, if you prevent these cookies from being stored.

Publishers and Advertisers have to ensure that the privacy policies of their websites include correct information about cookie usage for advertisement purposes. As the Company may use third-party cookies on Publisher websites displaying Advertiser or the Company ads, Publishers must have and abide by a privacy policy that discloses that third parties (i.e. Advertisers or the Company) may be placing and reading cookies on their users' browsers, or using web beacons to collect information as a result of advertisement serving on the Publisher website.

## Log Files

The Site makes use of log files for statistical purposes and internal system specific purposes. The Site also collects, processes, and uses your usage data in combination with your IP address and information about the amount of transmitted data stored in log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and number of clicks to analyze trends, administer the Site, track user's movement around the Site, and gather demographic information. IP addresses and other such information are not linked to any information that is personally identifiable. The log files are used to statistically analyze visits on the Site. The data is being deleted after it has been analyzed for statistical purposes.

## Pixel tracking

To ensure the correct delivery and effectiveness of the Advertisers' advertising campaigns, Publishers and, in some cases, Advertisers undertake to place on their websites pixel-tracking tags to measure usage statistics.

Publishers and Advertisers can place pixel tags also on their partners' websites (i.e. websites belonging not to them but third parties to where Traffic is directed through the Advertiser's ads).

These tags allow our software to measure non-personal behavioral patterns to indicate the effectiveness of the advertising. No personally identifiable information is collected during this process.

In order to ensure that Internet users are getting the best level of advertising, Publishers and, in some cases, Advertisers undertake to place also audience pixels to track the activity of Internet users and match ads to users. Audience pixels do not store any personally identifiable information.

The Company use audience pixels to match advertisements that may be of interest to Internet users or to assist our Advertisers and Publishers to deliver advertisements and offers that may be of interest to users within a given segment. The activity information collected during this process is not used in any other way by the Company or its clients other than to serve advertisements.

### **Purposes of the data processing**

The Company collects, processes, and uses the Information for purposes which you have consented to or for the purposes of access to LEADMob Platform and providing the Services that you want to get while using the Site, including but not limited to:

- providing with access to and maintaining and support of LEADMob Platform and the Services;
- providing, maintaining, delivering or improving the Site or the products or services provided by us our partners;
- analyzing and tracking data to determine the usefulness or popularity of certain content and to better understand the online activity of the Site users;
- fulfilling our legal or regulatory requirements;
- providing you with the information or products or services;
- answering your inquiry or responding to a communication from you;
- developing new products or services;
- sending you technical notices, support or administrative notifications;
- communicating with you about news, products, services, events and other information we think will be of interest to you or required to be received from you;
- matching your Information with open data and other resources;
- monitoring and analyzing trends, usage and activities in connection with the Site;
- detecting, investigating and preventing potential fraudulent or unauthorized or illegal transactions or activities;
- linking, connecting or combining Information we collect from or about you with other Information; and

- carrying out any other purpose or reason for which the Information was collected.

### Data recipients

The Company will not disclose, sell or transfer any of your personal and protected data to any third parties, except in the following cases: (i) you have an access and use LEADMob Platform; (ii) the Company receives your permission; (iii) The Company believes in good faith that any applicable laws or regulations require such disclosure or transfer, or the Company is required to do so by any competent authority; or (iii) as set forth below. The Company may also disclose such data if required to do so by law or the Company determines that such disclosure is reasonably necessary to (1) comply with legal process, (2) enforce your agreement with the Company, (3) respond to claims that any such data violates the rights of others, or (4) protect the rights, property or personal safety of the Company, its employees, users of or visitors to the Site, and the public.

All personally-identifiable data is maintained in strict confidence within the Site and will be treated with the highest level of respect and care.

The Company may contract with third parties to administer, host, distribute, resell, and/or support the Site. These third-party services providers have access to personal information only for the limited and specific purpose of performing services on our behalf and are expressly obligated not to disclose or use personal information for any other purpose.

In order to better process your matter, it might be necessary to forward your data to local subsidiaries or to local distribution partners, whose registered office might also be located in countries outside the European Union. Your personal data shall not be sold, leased or exchanged.

The Company reserve the right to disclose any Information as we in its sole discretion, believe necessary: (i) to satisfy or comply with any applicable law, regulation or legal process or to respond to lawful requests, including subpoenas, warrants or court orders; (ii) to protect our property, rights and safety and the rights, property and safety of third parties or the public in general; and (iii) to prevent or stop activity the Company considers to be illegal or unethical; (iv) to our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally; (v) certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of the Site like our online forums; (vi) in connection with a merger, assign or sale of our company assets, or if the Company does a financing or are involved in an acquisition or any other situation where Information may be disclosed; (vii) if the Company believes your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of any Party or others.

Any third-party so used will be required to enter into a confidentiality and non-disclosure agreement with us upon terms and conditions consistent with the policies set forth herein.

### International Data Transfers

This Site may be hosted on the web servers outside the EU. If you are located in the EU jurisdiction you agree that the provision of the Information or other access to the Site constitutes your consent to the transfer of such data/information, including Personal Information, to the jurisdiction where the Site is hosted that may not provide an equivalent level of data protection to the laws in your home country however we have procedures in place to ensure the protection of your information, including your Personal Information.

## DATA PROTECTION MEASURES

The Company implements the technical and organizational measures that are commercially reasonable in relation to the respective purpose of data protection, in order to protect the information provided by you against abuse and loss. Such data is stored in a secure operating environment that is not accessible to the public. In addition, each of our employees is instructed on data protection and obliged to enter into a confidentiality agreement. Any data that is stored on our or the third party servers is treated as proprietary and confidential and is not available to the public.

However, no computer security system is entirely fool proof and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the personal data you submit to or receive from us through the Internet, or for any unauthorized access or use of that information, and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received, or that it will not be altered before or after its transmission to us. You agree to not hold us and our respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns (collectively the "Parties") liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Site.

**Adhering to GDPR.** Providing any personal or other information ("Information") to the Company or LEADMob Platform, you hereby give your voluntary consent to use and disclose the Information in accordance with this Privacy Policy and Terms. The Company hereby ensures you that it has and will continue to be in compliance with all applicable law, including, but not limited to, European General Data Protection Regulation ("GDPR") in relation to all Information provided by you to the Company. Therewith, in no event, you should send to the Company or through the LEADMob Platform any categories of Information that always considered as "highly sensitive", including, but not limited to personal data revealing racial or ethnic origin, religious beliefs, genetic data, data concerning a person's health, a person's sexual orientation, trade union membership, or biometric data. You shall ensure you have properly informed any data subjects regarding their data's usage, storage, and transfer information. You shall ensure that it has obtained all necessary rights, consents, and authorizations from any data subjects for which the Information relates in connection with this Privacy Policy and Terms to allow LEADMob Platform or the Company to process the Information outside the data subject's country of residence. Any Data sent to LEADMob Platform or the Company will be processed within EU, or any other country where LEADMob Platform or the Company, or its contractors maintain data storage or processing facilities, and by using the Services, you hereby consent to such processing and storing of the Information. You shall provide reasonable assistance to the Company immediately upon request to enable the Company to respond to requests from data subject(s) seeking to exercise their rights under GDPR, or similar applicable data protection laws, rules, or regulations.

IF YOU RESIDE OUTSIDE THE EUROPEAN ECONOMIC AREA AND/OR ARE NOT SUBJECT TO THE PROTECTIONS OF THE GDPR, THEN YOU ACKNOWLEDGE AND AGREE THAT, BY CLICKING ON THE "I AGREE" OR "I ACCEPT" BUTTON, OR ACCESSING OR USING THE LEADMOb.IO WEBSITE OR RELATED SERVICES OR BY DOWNLOADING OR POSTING ANY CONTENT FROM OR ON THE WEBSITE OR THROUGH THE SERVICES, YOU ARE INDICATING THAT YOU HAVE READ, AND THAT YOU UNDERSTAND AND AGREE TO BE BOUND BY, THESE TERMS, WHETHER OR NOT YOU HAVE REGISTERED ON OR THROUGH THE WEBSITE. IF YOU DO NOT AGREE TO THIS AGREEMENT, THEN YOU HAVE NO RIGHT TO ACCESS OR USE THE LEADMOb-AD.COM WEBSITE OR RELATED SERVICES.



IF YOU ARE THE EUROPEAN ECONOMIC AREA RESIDENTS OR ENTITY ESTABLISHED IN THE ECONOMIC EUROPEAN AREA, AND SUBJECT TO THE PROTECTIONS OF THE GDPR, THEN YOU ACKNOWLEDGE AND AGREE THAT BY ACTIVELY CONSENTING TO THESE TERMS AND CONDITIONS, BY CLICKING THE "I AGREE" OR "I ACCEPT" BUTTON, THEN YOU ARE AGREEING TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS AGREEMENT. IF WE MODIFY THE AGREEMENT, WE WILL PROVIDE NOTICE TO YOU ON THE LEADMOB-AD.COM WEBSITE AND YOU MUST CONSENT TO THE CHANGES TO CONTINUE USING THE LEADMOB-AD.COM WEBSITE AND/OR RELATED SERVICES. IF YOU DO NOT ACTIVELY AGREE TO THIS AGREEMENT, THEN YOU HAVE NO RIGHT TO ACCESS OR USE THE LEADMOB-AD.COM WEBSITE OR RELATED SERVICES.

YOU MAY ALSO REQUEST TO HAVE ANY DATA LEADMOB-AD.COM MAY HAVE OBTAINED, TO BE DELETED, BY CONTACTING LEADMOB.IO'S DATA PROTECTION OFFICER AT DATA@LEADMOB.IO.

If you believe that any Information the Company is holding on you is incorrect or incomplete, please contact us as soon as possible. In addition, you have all other rights provided in applicable laws regulating data protection and electronic transmission of commercial notifications as stated below.

The European Economic Area residents have the following rights relating to their Personal Data:

1. right to access. You can request access to your personal data and obtain a copy of such personal data in a format acceptable to you (e.g. PDF, DOC, DOCX, etc.). You can submit such request by sending an email to DATA@LEADMOB.IO. After your request is received, our privacy team reviews the form and conducts requestor's identity verification without undue delay. Upon successful verification, you are provided with a copy of your personal data;
2. right to data portability. You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another service provider (controller) without hindrance from us;
3. right to erasure ("right to be forgotten") and right to rectification. You are entitled to request erasure or rectification of your personal data by sending us a respective request to DATA@LEADMOB.IO. We will handle requests for personal data to be rectified or deleted, unless there is a legal requirement that prohibits such request to be fulfilled. When request is fulfilled, you will be informed that your personal data is changed or erased and is not-longer collected, however, to fulfil our legal requirements LEADMOB will store information about each requestor for the purposes of providing an evidence that a request has been fulfilled;
4. right to object. At all times, you are entitled to object to processing of your personal data. Right to object can be exercised by sending an email to DATA@LEADMOB.IO. Upon receipt of the request, LEADMOB cease the processing, unless there is a legal or statutory ground for such processing;
5. right to be informed. If you are inquiring about processing activities conducted with respect to your personal data, LEADMOB, without undue delay, will provide information about: (i) purposes of processing; (ii) categories and types of personal data; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations (iii) retention period; (v) source of the relevant personal data; (vi) privacy rights and information on data portability; (vii) where the personal data are not collected from the data subject, any available information as to their source; (viii) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject; (ix) information as to whether personal data are

transferred to a third country or to an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. However, all information about the categories of personal data and processing operational conducted by LEADMOB is available in this policy; and

6. the right to lodge a complaint with a supervisory authority. Supervisory authority means an independent public authority which is established by an EU member state pursuant to Article 51 GDPR.

If you choose to close your LEADMob account, your personal data will be immediately deleted, except in the following cases. We retain your personal data after account deletion if it's reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce your agreement.

If you have any questions about the Company privacy policy or any request regarding the processing of your personal data, please write to us at:

Profit Commerce SRL

Romania, Bucharest, Aleea Barajul Sadului nr.1, blocN5, B1.1, fl.1, apartment 10, camera nr.2, sector 3

contact@leadmob.io