

Privacy policy

FLAMP PRIVACY POLICY

Last Updated on September 1, 2020

Hybrid Adtech Inc. is committed to protecting your privacy. This Privacy Policy describes how Hybrid Adtech Inc. collects, uses, and discloses personal information it collects when you use Flamp Application.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. USE OF FLAMP APPLICATION CONSTITUTES AN ACCEPTANCE OF THIS PRIVACY POLICY.

1. What Is It For?

1.1. Parties to This Policy.

This Privacy Policy (“Policy”) defines the regulation of the relationship between Hybrid Adtech Inc, incorporated under the laws of State of New York, USA, located at 616 Corporate way suite 2-3353, Valley Cottage, NY 10989, USA, (“Hybrid Adtech Inc.”, “Flamp”, “we”, “us”, “our”) and Data Subject (“you”, “your”) regarding the use of your Personal information collected and processed during your use of Flamp Application, Flamp Services, and your access to Account.

1.2. Purpose of This Policy.

The Purpose of this Policy is to provide you with information in a very clear and accessible way and simplify the understanding of the scope of your Personal information we collect, use or process, why do we do that, in which way do we do that, what rights regarding your Personal information do you have and what consequences of these actions may be.

1.3. Updates to This Policy.

Hybrid Adtech Inc. reserves the right to review this Policy from time to time. We will notify you of any updates or amendments by posting the new version of Privacy Policy. In case of any major changes, we will use our best endeavors to notify you before such changes come into force. If you continue using Flamp Application and Flamp Services, you acknowledge the acceptance of Policy including all updates.

We encourage you to review this Policy periodically for the latest information on our privacy and data protection practices.

1.4. Data Subject Age.

We take protection of personal information of the young very seriously. For this reason, we do not knowingly collect and process personal information from children who are under 13 years of age. If you believe that we might have any information from or about a child under 13, please contact us at support@flamp.io or use other means of communication available in the Application.

2. Definitions

All the terms used in this Privacy Policy that are not defined below are used in the meaning given to them in accordance with the Terms of Service.

“Personal information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Data Subject.

“Data Subject” means every individual (User and Visitor) whose Personal information is collected through the Application.

“user ID” means permanent personalized identifier is generated when you sign up and create an Account which contains your personal information we obtain from your Account and analytical information we automatically collect.

“client ID” means temporary non-identifying and automatically generated information we obtain when you visit the Application and which is saved in cookies by your browser.

“authorized agent” means a natural person or a business entity (its authorized representative) duly registered with the competent state authority that is authorized by Data Subject to act on its behalf.

“collection” means gathering, obtaining, receiving, or accessing any Personal information pertaining to Data Subject by means embodied in the Application, including receiving information from Data Subject, either actively or passively, as well as by observing Data Subjects' behavior.

“processing” means any operation or set of operations that are performed on Personal information or on sets of Personal information, whether by automated means or not.

3. What Personal Information Do We Collect?

We collect information about you to provide you with the Services and only if we need the information for some legitimate purpose. We do not collect it to sell or resell, either raw or processed, your Personal information to any third parties.

Hybrid Adtech Inc. will receive information about you if (a) you have provided the information yourself; (b) Hybrid Adtech Inc. has automatically collected the information. Below we describe the categories of the information collected in each case.

3.1. Personal information you provide us with.

i. Account information.

If you sign up and create an Account, we will ask you to provide your name, email address, company name, country and password in order to complete the sign-up process and provide you with access to the Application and Services.

ii. Paid Services.

If you choose to subscribe to get Paid Services, we will obtain billing information, such as name, address, phone number, taxpayer identification number. We do not collect your payment information such as credit card number. We obtain certain information from third-party payment processors, namely a client identifier of such payment system and payment identifier, in order to see the transaction history, to automatically renew or cancel your subscription as provided in Terms of Service.

iii. Interactions with Flamp.

You have the possibility to contact us by e-mail or other means of communication available in Application. We collect your Personal information that you provide us with when you interact with Flamp. We may record and afterwards use our conversations for improving our Services.

3.2. Personal information we automatically collect.

When you use the Application, we automatically collect the information from your browser and devices, namely the internet protocol address (IP address), geolocation data (if enabled in your browser), browser type, time zone, referring URL, date and time of access, operating system, device type, language. When you create an Account, we assign you a unique ID number (user ID). We use this information to recognize you when you are signed in, to analyze (and may also engage third parties to analyze) how the Application is used and to improve the overall Application and Services experience.

We automatically collect information from your browser and devices even if you are not signed into to Flamp Account, which includes the internet protocol address (IP address), client ID, the internet protocol address (IP address), geolocation data (if enabled in your browser), browser type, time zone, referring URL, date and time of access, operating system, device type, language.

4. Cookies.

Please note that we collect certain information from your browser and devices using cookies. Cookies are small text files that are stored on your computer or other

internet-connected device in order to identify your browser, provide analytics, and remember some information about you such as your login information when you access the Application and use the Services.

Information we obtain using cookies includes, among other, IP address, geolocation data, user/client ID, activities.

We use this information to make the functionality of our Application available to you, to keep you logged in (if accepted by you), to carry out analytics and statistics, for marketing purposes.

We may use both session cookies and persistent cookies. Session cookies expire when you close your browser automatically. A persistent cookies will remain until expire or you delete your cookies.

We may use third-party cookies set by the companies who provide analytics and statistics services to us. Please note that this Privacy Policy covers only our use of cookies and does not include use of cookies by third parties.

You can change your browser options as to handling cookies. If you do not accept or reject cookies, you may not be able to access some features of our Application and we recommend that you leave them turned on.

5. Personal information collected by third parties.

When you use the Application, our third-party partners may collect and process your personal information using SDK (software development kit) and other tools implemented to the Application, based on their privacy policies, namely user ID, client ID, IP address, including with the use of cookies.

This information may be used in order to identify you and analyze your behavior, including providing advertising about goods and services that you might be interested in.

Please be aware that Hybrid Adtech Inc. does not have access to such information and does nor processes it.

Please find a list of our third-party partners and the privacy policies describing their practices and allowing you to exercise your rights directly toward them hereafter:

Facebook Pixel;

Google Analytics.

6. What Are the Purposes of Collecting?

In addition to the purposes mentioned above, we use the collected Personal information for the following purposes:

- i. To provide you with our Services and ensure the smooth and enhanced experience with the Application;
- ii. To enable you to register, maintain and manage your Account;
- iii. To identify and authenticate you when you try to access your Account;
- iv. To communicate with you (such as through email) about significant changes to this Privacy Policy, changes to the Terms of Service, important notices or marketing and promotional information related to the Application and Services;
- v. To understand how you use the Application and Services, to monitor and prevent problems, and to improve the Application and Services;
- vi. To process your payments for Paid Services;
- vii. To ensure safety and security of the Application and Services and prevent the misuse and abuse of the Application and Services;
- viii. To provide customer support, and to analyze and improve our interactions with you;
- ix. To perform analytics and collect and maintain statistical data;
- x. To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;
- xi. To comply with applicable laws, legal requirements, relevant industry standards and policies, and Terms of Service.

If we obtain your personal information in any other way, we will provide you with a specific notice at the time of collection.

We do not use the personal information we collect to make automated decisions or profiling.

Again, we do not collect your personal information to sell it.

7. Who We Share Your Information With?

We do not sell any Personal information. We share your information only in the ways that are described in this Privacy Policy.

- i. Our employees and independent contractors.

Employees and independent contractors of Hybrid Adtech Inc. have access to the Personal information on a need-to-know basis. Be sure that we require all employees and independent contractors of Hybrid Adtech Inc. to follow this Privacy Policy for Personal information that we share with them.

- ii. Service providers.

We may need to disclose some of your Personal information and aggregated or de-identified information to third-party analytics providers, statistics providers, and payment processors, as well as vendors assisting us in enhancement of the safety and security of the Application or Services. These third-party service providers are

authorized to use your Personal information only as necessary to provide these services to us.

- iii. Disclosures in compliance with legal obligations.

We may be obliged to disclose certain Personal information to the law enforcement services, courts, and state authorities in order to comply with any applicable law, regulation, legal process or governmental request. We do so in order to:

- i. comply with the law or legal process (such as a court order or subpoena);
 - ii. establish, exercise or defend our legal rights;
 - iii. prevent physical or other harm or financial loss;
 - iv. in connection with an investigation of suspected or actual illegal activity; or
 - v. otherwise, provided that you give your consent.
- vi. Business transfers.

We do not intend to sell our business. However, we reserve the right to transfer any Personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation). We will notify you via e-mail or through a notice in the Application of any change in ownership or in the uses of your Personal information.

8. Your Rights

You may access, review and correct your Account Personal information by going to your Account and editing your information.

You may delete your Personal information by deleting your Account. We'll automatically delete your Personal information from our servers upon deletion of your Account.

You may unsubscribe from Flamp Paid Services as described in the Terms of Service. If you unsubscribe, your billing information will no longer be retained.

You may exercise other rights granted by the privacy, data protection and surveillance applicable laws.

California residents.

We do not sell or otherwise disclose your Personal information to third parties for monetary or other valuable consideration. If you are a California resident, you may request Hybrid Adtech Inc.:

- i. to disclose the categories and specific pieces of personal information Hybrid Adtech Inc. has collected, including categories of sources from which Personal information is collected; purpose for collecting or processing of Personal information; categories of third parties to whom Hybrid Adtech Inc. disclose

Personal information, if any; specific pieces of Personal information which Hybrid Adtech Inc. has collected about you;

- ii. to delete the Personal Information we have about you.

You may exercise the rights aforementioned by sending a verifiable request to support@flamp.io or by contacting us by communication means available in Application. If you are an authorized agent wishing to exercise rights on behalf of a California resident, you are also required to provide us with a copy of the consumer's written authorization designating you as agent.

Please note that if you submit a request we may require that you provide information so that we can verify the request and your jurisdiction before responding to it. If we are able to verify your request, we will process it. We endeavor to comply with a request within 45 days of its receipt. Taking into account the complexity and number of requests, we may require more time (up to 45 additional days). We will notify you of such an extension. We will only use the information received in a request for the purposes of responding to the request.

Exercising of your rights stated above will not lead to discriminatory treatment by Flamp (Hybrid Adtech Inc.).

9. Do Not Track requests

Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. Currently, there is no standard that governs what websites can or should do when they receive Do Not Track signals. For now, Flamp does not commit to responding to browsers' Do Not Track signals .

10. How Do We Protect and How We Do Store Your Personal Information?

We store Personal information in the United States of America. We use service cloud provider registered and located within the U.S. and prefer servers placed in the U.S. region.

Our cloud storage provider is Amazon.com, Inc.

We also implement suitable security measures to protect privacy and increase the level of safety and security of Personal information we collect and use to provide you with the Services and proper operation of the Application.

11. Links to Other Sites

The Application may contain links to other sites that are not operated by us. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services. We do not control the information collection of sites that can be reached through such links. Please note that if you submit your personal

information to any of these third-party sites, your personal information is governed by their privacy policies. We strongly advise you to review the privacy policy of every site you visit.

12. Retention of Personal Information

We will retain your Personal information for as long as your Account is activated or until the end of the retention period required by the applicable laws and regulations (e.g. if required in connection with a legal claim or proceeding, to comply with applicable legal, tax or accounting requirements). We will delete your Personal Information as soon as any legal grounds for retention will cease.

13. How to Contact Us

Should you have any questions concerning these this Privacy Policy, please contact us on support@flamp.io or mail us to 616 Corporate way suite 2-3353, Valley Cottage, NY 10989, USA.