#### **Online Privacy Notice**

### 1. Introduction.

- a. Web Site Owner. Hubby, LLC ("<u>Hubbly</u>") is the owner of this web site, www.Hubbly.co ("<u>the Site</u>"). This online privacy notice discloses Hubbly's information practices for the Site, including what type of personal identifiable information is collected, how the information is used, and with whom the information is shared. Other web sites owned by Hubbly may be governed by privacy notices containing different information practices applicable to those sites.
- b. **Anonymous Web Site Visits.** In general, you can visit on the Site without disclosing OR revealing any personal information. Hubbly does keep track of the domains from which people visit us, and Hubbly analyzes the data gathered from the Site visits for trends and statistics.
- c. Web Site Transactions. At times, Hubbly will need personal information regarding a customer or a prospect. For example, to add a customer to a mailing list, Hubbly may need to know a customer's name, mailing address, and e-mail address. It is Hubbly's intent to inform you before Hubbly collects personal information, such as user's name and/or address on the internet. If you tell us that you do not wish to have this information used as a basis for further contact with you, Hubbly will respect your wishes.

## 2. Personal Information That May Be Collected.

- a. **Identifying Information.** In order to contact us, Hubbly will request a user to provide certain personal identifying information, which may include: legal name, postal address, e-mail address, and telephone number. Hubbly may request additional information necessary to establish and maintain customer's account.
- b. **Service Quality Monitoring.** Some Web site transactions may require a customer to telephone Hubbly, or Hubbly to call the customer. Hubbly will not contact you by telephone without your prior consent. Customer should be aware that it is Hubbly's practice to monitor, and in some cases record such calls for staff training or quality assurance purposes.
- c. **Information from Children.** Hubbly does not use personally identifying information collected from children for marketing or promotional purposes.
- d. Links to Other Web Sites. The Site may contain links to other web sites. Hubbly is not responsible for the privacy practices or the content of those other web sites.

### 3. Uses Made of the Information.

- a. **Limited Uses Identified.** Without customer's prior consent, Hubbly will not use your personal identifiable information for any purpose other than that for which it is submitted. Hubbly uses personal identifiable information to reply to inquiries, handle complaints, and to market their services to potential and current customers.
- b. Stored Information Uses. Hubbly stores and retains the information provided by customer. This information may be used to enable Hubbly to recommend products, services, or special offers that would be of interest to a customer; to deliver customer services; and/or to contact customer again about other Hubbly services and products.

### 4. Disclosure of the Information.

- a. **Mergers and Acquisitions.** Circumstances may arise where for business reasons, Hubbly decides to sell, buy, merge or otherwise reorganize its businesses in the United States or some other country. Such a transaction may involve the disclosure of personal identifying information to prospective or actual purchasers, and/or receiving such information from sellers. It is Hubbly's practice to seek appropriate protection for information in these types of transactions.
- b. **Agents.** Hubbly employs or engages other companies and individuals to perform business functions on behalf of Hubbly. These persons are provided with personal identifying information required to perform their functions but are prohibited by contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments and providing customer services.
- c. **Marketing Analysis by Third Parties.** Hubbly reserves the right to disclose to third parties personal information about customers for marketing analysis.
- d. **Disclosure to Governmental Authorities.** Under certain circumstances, personal information may be subject to disclosure pursuant to a judicial or other government subpoenas, warrants or orders.
- 5. Use of Computer Tracking Technologies.

- a. Tracking of Personal Information. The Site is set up to track and collect personal information not entered by visitors, including IP address and information about your visit, including the full URL clickstream to, through and from the Site, including date and time; pages you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information such as scrolling clicks, and mouse-overs; and methos used to browse away from the page. Such tracking as described in this Section 5(a) only occurs upon acceptance of the use of cookies by the customer as described in Section 5(b). You have the option to decline this feature, although your ability to access some features of the Site could be limited. Additionally, through web site access logs Hubbly does collect clickstream data and HTTP protocol elements, which generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our sites. This information is used for internal purposes by technical support staff for research and development, user analysis and business decision making, all of which provides better services to the public. The statistics garnered, which contain no personal information and cannot be used to gather such information, may also be provided to third parties.
- b. Use of Cookies. With your permission, Hubbly collects non-identifiable and personal information through the use of various technologies, including "cookies". A cookie is an alphanumeric identifier that a web site can transfer to customer's hard drive through customer's browser. The cookie is then stored on customer's computer as an anonymous tag that identifies the customer's computer, but not the customer. Cookies may be sent by Hubbly or its third-party vendors. Hubbly will only use cookies when you visit the Site if you "accept" the GDPR Cookie Consent that comes up along the bottom of the Site by clicking "accept." Customers can also set their browser to notify them before a cookie is received, giving an opportunity to decide whether to accept the cookie. Customers may also set their browser to turn off cookies; however, some web sites may not then work properly.
- c. Collection of Non-Identifiable Information. Hubbly may collect non-identifiable information from user visits to the Site in order to provide better customer service. Examples of such collecting include: traffic analysis, such as tracking of the domains from which users visit or tracking numbers of visitors; measuring visitor activity on the Site; web site and system administration; user analysis; and business decision making. Such information is sometimes known as "clickstream data." Hubbly or its contractors may use this data to analyze trends and statistics.
- d. **Collection of Personal Information.** Hubbly collects personal identifying information from customers during a transaction. Hubbly may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information, such as clickstream data. This information is used and analyzed only at an aggregate level (not at an individual level) to help Hubbly understand trends and patterns. This information is not reviewed at an individual level.

### 6. Information Security.

- a. **Commitment to Online Security.** Hubbly employs physical, electronic and managerial procedures to safeguard the security and integrity of personal information. Billing and payment data is encrypted whenever transmitted or received online. Personal information is accessible only by staff designated to handle online requests or complaints. All Hubbly agents and contractors with access to personal information on the Site are also bound to adhere to Hubbly security standards.
- b. No Liability for Acts of Third Parties. Hubbly will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, Hubbly shall not be liable for unauthorized disclosure of personal information due to no fault of Hubbly including, but not limited to, errors in transmission and unauthorized acts of Hubbly staff and/or third parties.
- c. Non-US Residents. The Site and its servers are operated in 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 irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.
- 7. Privacy Policy Changes and Opt-Out Rights.

- a. **Changes to Privacy Policy.** This privacy notice was last updated on December 7, 2022. Hubbly reserves the right to change or update its privacy policy statement at any time. A notice of such change will be posted on the Site for thirty (30) days prior to the implementation of such change.
- b. Opt-Out Right. Customers have the right at any time to cease permitting personal information to be collected, used or disclosed by Hubbly and/or by any third parties with whom Hubbly has shared and/or transferred such personal information. Right of cancellation may be exercised by contacting Hubbly via e-mail at Team@Hubbly.co After processing the cancellation, Hubbly will delete customer's personal information from its data base.

# 8. Access Rights to Data.

- a. **Information Maintained by Hubbly.** Upon customer's request, Hubbly will provide a reasonable description of customer's personally identifiable information that Hubbly maintains in its data bank. Hubbly can be contacted by e-mail at Team@Hubbly.co.
- b. **Corrections and Changes to Personal Information.** Help Hubbly to keep customer personal information accurate. If customer's personal information changes, or if customer notes an error upon review of customer information that Hubbly has on file, please promptly e-mail Hubbly at Team@Hubbly.co and provide the new or correct information.
- c. Your California Privacy Rights. Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of Hubbly who are California residents to request certain information regarding Hubbly's disclosure of personal information for their direct marketing purposes. To make such a request, please email Hubbly at Team@Hubbly.co. Within 30 days of receiving such a request, Hubbly will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. Hubbly reserves its right not to respond to requests submitted other than to the email address specified in this paragraph.

California's privacy laws require a company to provide notice to California users of their rights to receive information on to which entities their information was shared for marketing purposes.

### 1. Accountability.

a. **Terms of Use.** If customer chooses to enter personal information into the Site or otherwise solicit information from the Site, customer's action is hereby deemed acceptance of Hubbly's practices described in this policy statement.