

## **Coub Privacy Policy**

We are Coub.com Ltd existing under the laws of the British Virgin Islands and having its registered address at Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands ("**we**"). We respect your privacy and are committed to protecting it through our compliance with applicable data protection laws and this Privacy Policy.

This Privacy Policy describes the processing of personal information we may collect from the user ("**you**") where: (1) you use the coub.com website (the "**Website**") and the Coub mobile applications maintained by us, features or functionality of software (collectively, the "**Coub Services**"); and (2) you reach out to us with any inquiries, such as requests for the technical support, troubleshooting and to exercise your rights. For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (the "**GDPR**"), your data will be controlled by us together with our affiliates as listed on our Website and updated from time to time.

Please read this Privacy Policy carefully to understand our policies and practices on the processing of your personal information. By registering for or accessing our Coub Services, you agree to this Privacy Policy. If you do not agree with our Privacy Policy, please do not register or access the Coub Services.

As our processing of your personal information is tightly linked to the provision of the Coub Services in accordance with the Terms of Service Agreement (the "**ToS**") available at <https://coub.com/tos>, please also carefully read this document if you have not done this before. This Privacy Policy is incorporated by reference into the ToS and any terms used in this policy but not defined herein are defined in the ToS.

### **How Do We Collect Your Personal Information?**

Directly from you. To provide the Coub Services, we may request your personal information, for example, upon registration of the User Account.

Automatically collected data. By providing the Coub Services, we use certain technologies, like cookies and web beacons, that may automatically collect information relating to you.

From third parties. We may obtain certain information about you from our partners.

### **What Information Do We Collect About You?**

The information we collect through our Coub Services includes the following:

1. Information that you provide at the time of registration of User Account, subscribing to our Coub Services, or requesting further services. Such personal information includes first name and last name, photo, nickname, email address. And in order to take full advantage of the dynamic features we offer, we may ask you to create a publicly visible User Profile, which may include your name and photo.
2. Information you provide when you contact us, including to report a problem with our Coub Services or copyright infringement (including address, telephone number). When you contact us, we may keep a record of your communication to help resolve any issues you might be facing in the future.
3. Your responses to surveys that we might ask you to complete for research purposes. In most cases our surveys are anonymous, and we do not attribute your responses to you either directly or indirectly.
4. Details of ownership or attribution for any Contributions, creative works, productions, or other content generated by you as a user on the Coub Services (the "**User Generated Content**").
5. Financial information. Currently, you are not required to provide any financial information to us before using the Coub Services, but we reserve the right to require such information if and when we choose

to offer products or services for sale through our Coub Services and you choose to use or purchase them.

6. When you access the Coub Services, our servers (using log files or filtering systems) may collect information from your web browser or mobile device. This information may include but is not limited to your Internet Protocol address (IP address), Media Access Control (MAC) address, the type and version of your computer's operating system, screen resolution, and the type and version of your Internet browser, hardware model, operating system version, any referring web page you were visiting while accessing our Coub Services, the date and time of each request, information you search for, and other information collected by cookies or similar technologies.

Within our cookies tools you can choose what types of cookies you allow us to use. If you do not accept cookies, however, you may not be able to use some sections or functions of our Website. Please be aware that you cannot disable the cookies, which are necessary to deliver the Coub Services. In such case we will use cookies on a basis of the contractual necessity and our legitimate interest in delivering the Coub Services.

### **Mobile Device Tracking Technologies and Geolocation Data**

Your mobile device may have certain settings that relate to the Applications Programming Interface or "API" that allows mobile applications or "apps" to access standard categories of content on a mobile device, but also sensitive content such as geolocation information. It is suggested by organizations responsible for the protection of consumer privacy interests, such as the Federal Trade Commission that consumers should familiarize themselves with the privacy setting options available on their mobile devices to determine what information may be collected or tracked by certain applications and what steps can be taken to control that access, collection or tracking. These steps may differ depending on whether the mobile device's operating platform is based on the "iOS" used in most Apple smartphones or the Android platforms used in others. Depending on the platform used by your mobile device you should be able to review the type of data collected by mobile applications, including the mobile applications provided by the Coub Services, which may vary depending on the privacy settings on your device. For further information about these privacy settings, please contact your device manufacturer, mobile service provider, or the provider of the operating platform installed on your device. For further information on data collected specific to mobile applications used for the Coub Services as provided in this Privacy Policy please contact us as described in section "Contact Information" below.

### **How Do We Use Your Personal Information?**

Your personal information shall be processed by us solely for the purposes set out in this Policy, and such processing shall be limited to the achievement of these purposes. We do not allow processing of personal information in a way which is incompatible with the purposes for which they are collected as provided for in this Policy and other documents which you may find on the Website (for example, in the consent to the processing of your personal data which you give to us).

If you choose to provide us with personal information, we will use that personal information for the following purposes:

1. to deliver and operate our Coub Services in accordance with the ToS, including participation in interactive features and making full functionality of Coub Services available to you;
2. to contact you in connection with any products or services you request from us, receive your feedback and respond to your questions that you may have;
3. to provide you with notices about your User Account and/ or changes to our Coub Services or any products or services we offer or provide through them;

4. to ensure stable functioning of the Coub Services, manage any technical issues that you may have, and improve the Coub Services;
5. to improve the overall quality of your online experience and estimate our audience size and usage patterns;
6. to respond to inquiries or questions that you may address to us, including in connection with our processing of personal information;
7. to carry out our rights and obligations arising from any contracts entered into with you;
8. to comply with our legal obligations in accordance with the laws that are applicable to us.

### **Legal Basis for Which We Use Your Personal Information**

Your personal information shall be processed by us only if there is a legal ground for such processing provided for by the applicable data protection laws. For the purposes of the GDPR, we rely on the legitimate interests (provided that your fundamental rights do not override such interests) and performance of a contract processing grounds to collect the personal information described in this Privacy Policy, excluding any personal information for which we act as a data processor only.

Our legitimate interests include those interests described in the "How Do We Use Your Personal Information?" section above.

Where we need to collect personal information under the terms of a contract we have with you and you fail to provide the personal information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with some or all of Coub Services). In this case, we may have to decline to provide or receive the relevant services, but we will notify you if this is the case at the time the personal information is collected.

Also, we process your personal information based on consent in cases when it is required by the personal data protection laws (in particular, consent for the marketing and advertising activities).

### **Transfer of Your Personal Information**

We may transfer your personal information to third parties as follows:

1. **Subcontractors:** We contract with other companies (i.e., contractors, service providers) to support the Coub Services, they are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose to them.
2. **Affiliates:** We have a number of affiliates (a list of which is available on our Website and with whom the personal information may be shared in order to allow us to provide the Coub Services to you and accomplish the purposes specified herein.
3. **Transfer of business:** We may provide your personal information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which such information is among the assets transferred.
4. **Legal:** We may provide personal information to respond to subpoenas, court orders, legal process or governmental regulations, or to establish or exercise our legal rights or defend against legal claims. We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law. In such circumstances, we will take appropriate measures to ensure that the requester understands the sensitive nature of the personal information that they may receive.

If you want to learn more about third parties, with whom we share your personal information, please contact us as described below in this Privacy Policy, and we will provide their names and addresses to you.

Where we transfer your personal information outside the EEA we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. we will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (in the case of transfers out of the EEA); and
2. where we use certain service providers, we may use specific contracts approved for use in by the European Commission (in the case of transfers out of the EEA) which gives personal information the same protection it has within the EEA.

### **How Long Do We Store Your Personal Information?**

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of the personal information, the purposes for which we process personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Your Rights**

Depending on the laws applicable to you, you may have some or all of the following rights in connection with our processing of your personal data:

1. access a copy of your personal information that we have collected from you;
2. rectify your personal information;
3. have your personal information erased in certain circumstances;
4. restrict our processing of your personal information in certain circumstances;
5. object to our processing of certain of your personal information if we do not require such personal information for legitimate business purposes or other legal reasons; and/or
6. to revoke your consent to processing of personal data that you have previously provided to us.

If you want to exercise any of the above rights, please address your corresponding inquiry to us as described in "Contact Information" section below.

You will not have to pay a fee to access your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If you request an update of your information and we believe such update would violate any law or legal requirement or cause the information to be incorrect, we may also refuse to comply with the request.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our

response. We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you believe that we violate the laws when processing your personal information, you can lodge a complaint against us with the respective data protection authority.

### **Privacy When Linking to Third-Party Sites or Social Networking Sites**

We are not responsible for the privacy policies and practices of other websites, even if you access them through the Coub Services. You should check the policy of each website you visit and contact its owner or operator if you have any concerns or questions. In addition, if you link to the Website from a third-party site or via a social networking site (e.g. Twitter, Facebook), we are not responsible for the privacy policies and practices of the owners or operators of that third party site and recommends that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

When you associate a social networking site with the Coub Services during either account registration or account linking, you allow us to collect, store and use certain personal and non-personal information that you provided to each respective social networking site (i.e., as your user ID, first and last name, profile picture, email address and associated usage data). Use of such information by us are governed by this Privacy Policy.

### **Data Security**

We have implemented appropriate security measures designed to prevent your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Coub Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we have endeavoured to create secure and reliable Coub Services and do our best to protect your personal information, the confidentiality of any communication or material transmitted through our Coub Services cannot be guaranteed.

Further, you may contribute User Generated Content, including photos, videos, digital media, graphics, likes or other information to be published or displayed through our Coub Services, or transmitted to other users of the Coub Services or third parties. Your User Generated Content is posted and transmitted to others at your own risk. We cannot control the actions of other users of our Coub Services with whom you may choose to share your User Generated Content. Therefore, we cannot and do not guarantee that your User Generated Content will not be viewed by unauthorized persons.

Further, if you delete your User Generated Content from our Coub Services, copies of your User Generated Content may remain viewable in cached and archived pages, or might have been copied or stored by other users of our Coub Services. Proper access and use of information provided through the Coub Services, including User Generated Content, is governed by our ToS.

### **Minors**

We understand the importance of protecting children's privacy in the interactive online world. The Coub Services are not designed for, or intentionally targeted at, individuals under 18 years of age.

No one under age 18 may provide any personal information to our Coub Services. If you are under 18, do not register for any of our Coub Services or use or provide any information to us, contribute or use any User Generated Content, use any of the interactive or public comment features available through the Coub Services. If we learn we have collected or received personal information from an individual under 18 without verification of a parental consent, we will delete that information. If you believe we might have any information from or about an individual under 18, please contact us as described in section "Contact Information" below.

### **Changes to Our Privacy Policy**

This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. It is our policy to provide advance notice on the Website about any changes we make to our Privacy Policy on this page. Changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. We display an effective date on the policy in the upper right corner of this Privacy Policy so that it will be easier for you to know when there has been a change.

### **Contact Information**

If you have questions or concerns about this Privacy Policy or how we collect and use your or to request a copy of this Privacy Notice in another format, you can email us at [support@coub.com](mailto:support@coub.com). If we need, or are required, to contact you concerning any event that involves your information, we may do so by email, telephone, or mail that you have provided to us.