

Freshub™ Privacy Policy

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This privacy policy ("**Privacy Policy**") describes our, Freshub Ltd.'s ("**Freshub**", "**we**", "**our**" or "**us**"), information practices in connection with the access and use of: (a) our websites www.freshub.com and <https://www.smartkitchenassistant.com/> (together with its subdomains, features, and services available thereon, the "**Sites**"), and/or (b) our *Kitchen Connect*™ software application (the "**App**"). The Sites and the App may individually and collectively be referred to herein as the "**Services**". The section and sub-section headings used below are for convenience of reading only (and are not to be used for interpretive purposes), but we hope they make navigating this Privacy Policy easier.

Freshub does not itself host the Services – all hosting is done by third party hosting providers that we engage. This means that data you provide us or that we or third parties collect from you (including any Personal Information) is hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers themselves are based (and some are US-based), their servers may be located anywhere in the world (including the US). Your data may even be replicated across multiple servers located in multiple countries. So please be aware that you are consenting to your data being transferred to various third party service providers around the world.

Generally speaking, Freshub receives information because:

- (a) You have provided it to us;
- (b) We collect it from you; and/or
- (c) Third parties we engage (such as a data analytics provider) collect it from you on our behalf. This happens in cases where we use or deploy third party tracking technology, or where we otherwise give these third parties access to our technology. **So where we describe below in Section 4 (*Information We Collect From You*) the ways in which we collect information from you, you acknowledge that such collection may also be carried out by third parties.** These third parties may have their own privacy policies that they adhere to, so they won't necessarily adhere to this Privacy Policy; *however*, we do try to engage third parties that post a privacy policy. Also, just as with our third party hosting providers, these third parties may be based (and their servers may be located) anywhere in the world

The information we receive may be about you as well as the ways in which you use the Services. For the purposes of this Privacy Policy, we categorize information as either Personal Information or Anonymous Information.

"**Personal Information**" means information that may be used, either alone or in combination with other information, to personally identify an individual, such as a first and last name, an email address, phone number, a home or other physical address, and other contact information.

"**Anonymous Information**" means information which is not Personal Information, such as aggregated information.

1. **EULA.** This Privacy Policy forms part of the App's *End User License Agreement* (the "**EULA**"), the definitive version of which can be viewed on the Sites and/or in the App. Any capitalized term in this Privacy Policy that we don't define, shall have the meaning given to it in the EULA.
2. **Consent and Modification.** You are not legally obligated to provide us with any Personal Information (and you acknowledge that providing us with Personal Information is done freely). Nor are you required to use the Services in the first place. By accessing or using the any of the Services you consent to this Privacy Policy and to our information practices described herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Services. We reserve the right, in our sole discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on any of our Sites and your continued use of any of the Services after such 10-day period shall constitute your acceptance of those changes. In such cases, we will also update the "*Last Updated*" date set forth above. Please check the above webpage regularly for any changes.
3. **Information You Provide To Us.** Currently, we require you to provide us with certain types of Personal Information in order to use parts of the Services and benefit from some of their features. Here are some examples:

- 3.1. Account Creation. In order to use the App, you will need to register an App Account (as defined in the EULA), which will require you (or in some cases, may just give you the option) to provide Personal Information (such as your name and email address) by way of submitting an online form. We may send an email to your nominated email address to instruct you how to confirm your registration.
- 3.2. Location Data. Certain features may collect or be dependent on data related to your geographic location ("**Location Data**"). If you wish to use these features, you agree to provide or to make your Location Data accessible to us. To the extent that we do collect Location Data, we shall use it in accordance with the Privacy Policy. If you do not provide or make such Location Data accessible, then the features may be limited or not operate.
- 3.3. 'Contact Us'. If you send us a 'Contact Us' (or similar) request, whether by submitting an online form that we make available, by sending an email to an email address that we display, by using a feedback or reporting feature, or by other means, you may be required to provide us with certain Personal Information, such as your name and email address.
- 3.4. Purchases. The App may offer the option of purchasing certain products or services from us. If you choose to make a purchase we will require sufficient Personal Information from you in order to process the purchase. Such information could include a credit card number and related account and billing information. We may use the products and services of third party service providers to process these purchases, in which case you will be providing the information to them as well.
- 3.5. Blogs, Newsletters, Surveys and Promotions. The Services may also offer you the opportunity to subscribe to newsletters and participate in surveys and other promotional activities. In each of the foregoing cases, your interaction (such as responding on the blog forum, subscribing to a newsletter, or participating in a survey) may require you to provide certain Personal Information such as your name and email address.
- 3.6. Google Analytics. The Sites may use a tool called "Google Analytics" to collect information about use of the Sites. Google Analytics collects information such as how often users visit the Sites, what pages they visit when they do so, and what other sites they used prior to coming to the Sites. We use the information we get from Google Analytics to maintain and improve the Sites and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to the Sites is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- 3.7. Chat. The Services may allow you to initiate a one-on-one chat conversation with a representative of Freshub (and/or our third party providers) in order to make inquiries and/or request support regarding Freshub products ("**Chat**"). You should be aware that any information you submit in the course of a Chat can be read, collected, or used by us (and/or our third party providers) in accordance with this Privacy Policy. If you choose to initiate a Chat, we (and/or our third party providers) may collect certain information from you such as the text and time stamps of your Chat messages, your browser location and IP address.
- 4. Information We Collect From You.** We collect Personal Information and Anonymous Information from you in the following ways:
 - 4.1. Log Files; Device and Usage Data. We collect information through server log files, but also by deploying tracking technologies within the Services. We do this to analyze trends, track user movement around the Services, gather demographic information, and to generally collect information that we may find insightful or helpful. The type of information collected may include (but is not limited to) internet protocol (IP) addresses, MAC address, phone number, device type, browser type, operating system type, type of browser, Internet Service Provider (ISP), date/time stamp of use, referring/exit pages, and clicked pages.
 - 4.2. Cookies. The Services may use "cookies". A cookie is text file placed on your hard drive and stored by your browser. We use cookies to administer, and provide you with access to, the Services; but we also use cookies to improve the user experience of the Services (for example, cookies and other technologies may serve to recall an

IP address previously indicated by a user) and to collect statistical or anonymous data about how you and other users use and interact with the Services, which may include for the purpose of serving advertisements. Some of the cookies are set by us, and some may be set by third parties (for example, social plug-ins within the Services (such as a "Like" button) involve the setting of cookies by the applicable third party). If you do not want to receive cookies, consult your respective browser settings. This may allow you to receive notifications when cookies are set, or to otherwise block cookies altogether. You may also be able to delete cookies that have already been set. If you do block or restrict cookies, you will still be able to use the Services, but various features and functionality may be impaired.

- 5. The Way We Use Personal Information.** In addition to the uses of Personal Information described elsewhere in this Privacy Policy, we also use Personal Information in the following ways:
 - 5.1. **To Generally Provide You With the Services.** We will use your Personal Information to: (a) administer and provide the Services to you; (b) further develop and generally improve the Services; (c) send you updates, promotions, offerings, or other news of/about the Services and/or Freshub; (d) respond to communications with you; (e) identify or authenticate your access and use of the App or an App Account; and/or (f) send you updates and marketing information related to our products and services.
 - 5.2. **Transfer To Affiliates.** We may send or otherwise share your Personal Information to our affiliated entities for the purpose of storing such information on our behalf, or for other processing needs. These affiliated entities may be based in other countries, and their servers may be located anywhere in the world. We require these affiliated entities to agree to process such Personal Information in accordance with this Privacy Policy.
 - 5.3. **Transfer To Third Parties.** We send or otherwise share your Personal Information with various third parties that help us with our business operations and help us understand how our users use the Services, and to improve the Services generally. These third parties may have their own privacy policies that they adhere to, so they won't necessarily adhere to this Privacy Policy; *however*, we do try to engage third parties that post a privacy policy. Also, just as with our third party hosting providers, these third parties may be based (and their servers may be located) anywhere in the world.
 - 5.4. **Enforcement.** We may share your Personal Information with any third party if we believe that disclosure of such information is helpful or reasonably necessary to: (a) comply with any applicable law, regulation, legal process, or governmental request; (b) enforce the EULA, including investigations of potential violations thereof; (c) detect, prevent, or otherwise address fraud or security issues; and/or (d) protect against harm to the rights, property or safety of Freshub, our users, yourself and/or the public.
- 6. Publicly Available Information.** Any content that you make publicly available on or via the Services will be publicly available to other users of the Services. If you actively or passively allow your contact information to be public, you may receive unsolicited messages or activity from other users of the Services. We therefore encourage you only to post information that you are sure you want to be publicly accessible.
- 7. Access and Accuracy; Deletion.** We would like to maintain accurate Personal Information. If you would like to delete or correct any of your Personal Information that we may be storing, there may be tools that we make available within the Services. Otherwise, please contact us at support@freshub.com to request deletion (although we do not undertake to respond to, or otherwise implement, the request within any period of time). Please be aware that information deleted (whether directly by you or pursuant to a delete request) may or may not be permanently deleted by Freshub, and may remain stored on our servers (and/or those of our hosting providers, as applicable). In such cases, the information will no longer be accessible to you. We, in our sole discretion, decide whether or not to permanently delete information from our servers.
- 8. Opt-Out.** You may choose not to receive future promotional, advertising, or other Services-related emails from us by selecting an unsubscribe link at the bottom of each email that we send. Please note that even if you opt out of receiving such emails, we may still send you administrative emails to facilitate your use of the Services.
- 9. Links to and Interaction with Third Party Products.** The Services may link to third party content, products and services. Any Personal Information you provide in connection therewith is provided to the third party. We are not responsible for the privacy practices of such third parties, or for such content, products and services, and we encourage you to read the terms and conditions and privacy policy of each third party that you choose to use or interact with.

10. **Anonymous Information.** We may use and share Anonymous Information for any purpose whatsoever and with any third parties (such as advertisers and marketing partners), including in exchange for compensation.
11. **Advertising and Behavioral Remarketing.** To help us deliver meaningful advertisements, offers, and marketing content that are relevant to you based on criteria such as your visits to and/or usage of the Services (or other third party online or mobile websites, applications, platforms or services), we and our third party vendors (including those listed below) may use cookies and other pixels to customize or personalize such advertisements, offers and content, and analyze the performance of those advertisements, offers and content, as well as your interaction with them. Freshub may use remarketing services to advertise to you on third party websites after you have visited our Services.
12. **Children's Privacy.** The Services are not designed to attract children under the age of 13. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 13. If we learn that we have collected Personal Information from a child under 13, we will use commercially reasonable efforts to delete that information as quickly as possible. If you believe that we might have any such information, please contact us at support@freshub.com.
13. **Security.** We use administrative, physical and technical safeguards to protect Personal Information. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we try to use reasonably acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Services, you can contact us at support@freshub.com.
14. **Merger, Sale or Bankruptcy.** In the event that Freshub is acquired by or merged with a third party entity, we may (and hereby reserve the right to) transfer or assign the Personal Information and other information we have collected or received. In the event of a bankruptcy, insolvency, receivership, or comparable event, we may not be able to control how your Personal Information is treated, transferred, or used.
15. **California Privacy Rights.** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to support@freshub.com. Please note that we are only required to respond to one request per customer each year.
16. **Our California Do Not Track Notice.** We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Information about that individual consumer's online activities over time and across third-party websites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect Personal Information about an individual consumer's online activities over time and across different websites when a consumer uses the Services.
17. **Deletion of Content from California Residents.** If you are a California resident under the age of 18 and a registered user of the Services (for example, if you have an Account), California Business and Professions Code Section 22581 permits you to remove content or information you have publicly posted. If you wish to remove such content or information and you specify which content or information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content or information. In addition, such removal does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require us to enable removal of the content or information.
18. **Commitment.** Protecting your privacy online is an evolving area, and we try to evolve our Services to meet these demands. If you have any comments or questions regarding our Privacy Policy, please contact us at support@freshub.com.