

LUBUTO PRIVACY POLICY

Updated: 29 April 2021

1. GENERAL

1.1 This Privacy Policy ("Policy") explains in how AMBISIE Pty Ltd and its related bodies corporate ("AMBISIE", "LUBUTO", "we", "our" or "us") collects, stores, uses and discloses your personal information.

1.2 By using, browsing or accessing the LUBUTO website ("Website") or by accessing or using our products and services (including our LUBUTO platform) ("Products"), you indicate that you have read, understood and accept this Policy.

2. COLLECTION OF YOUR PERSONAL INFORMATION?

2.1 We may collect your personal information in the following ways:

- (a) directly from you when you deal with us either in person, by telephone, letter, facsimile, email or when you visit, access or use our Website and/or our Products;
- (b) when we invite you to complete surveys, questionnaires or provide us with feedback;
- (c) from our related bodies corporate; and
- (d) from service providers, for example Slack, or linked social networking account.

2.2 If you provide to us personal information about someone else, we rely on you to inform them that you are providing their personal information to us and to advise them that we can be contacted for further information.

3. WHAT PERSONAL INFORMATION DO WE COLLECT?

3.1 Generally, the type of personal information we collect about you depends on the type of dealings that you have with us and includes the information that is needed to facilitate the operation of our Products. For example, we may collect details such as your name, date of birth, mailing address, telephone number, mobile number, email address. We also collect information that is required for use in the business activities of LUBUTO, including for example, financial details necessary in order to process various transactions and any other information you may elect to provide to us.

4. HOW DO WE USE PERSONAL INFORMATION?

4.1 We use your personal information:

- (a) to provide you with our Products;
- (b) for identification of fraud or error;
- (c) for regulatory reporting and compliance;
- (d) for developing, improving and marketing our Products;
- (e) to service our relationship with you by, among other things, providing updates on promotions, products and services we think may interest you;
- (f) to involve you in market research gauging customer satisfaction and seeking feedback regarding our relationship with you;

- (g) for business analysis purposes;
- (h) for marketing activities; and
- (i) for internal accounting and administration purposes.

5. DISCLOSURE TO THIRD PARTIES

5.1 We may disclose your personal information:

- (a) to various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes;
- (b) to our third party service providers, such as marketing and analysis organisations, financial and credit card institutions in order to process any payments, hosting companies, web developers, internet service providers, customer service providers, customer support specialists, fulfilment companies and external business advisors (such as auditors and lawyers);
- (c) to third parties participating in our Product;
- (d) to social media platforms, for analytics and to provide targeted advertising to you;
- (e) to third parties such as platform service providers;
- (f) to third parties who may involve you in market research for the purpose of servicing our relationship with you and improving the services we provide;
- (g) to our subsidiaries, holding company, related entities, related bodies corporate and joint venture partners.

5.2 Where we engage third party service providers to perform services for us, we will use our best endeavours to impose contractual obligations on those third party service provider to ensure that they must only use personal information in accordance with our direction.

6. TRANS-BORDER DATA FLOWS

6.1 We may transfer your personal information outside of your own country, including to the United States, for processing, including analytics, and storage. This may result in your data being transferred to a country which has a lower standard of data protection than the country in which you reside. Wherever your data is transferred, it may be accessed by the courts, regulatory bodies, and law enforcement and national security authorities, according to the laws in the relevant jurisdiction.

7. SECURITY OF INFORMATION

7.1 LUBUTO has implemented physical, electronic and managerial security procedures (including SSL encryption) and will use its reasonable endeavours to protect personal information and credit card details from loss, misuse, alteration or destruction. LUBUTO regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.

7.2 Despite our reasonable endeavours, we do not warrant the security of any personal information transmitted to us. Accordingly, all personal information disclosed by you to us is at your own risk and we are not liable for any unauthorised access to the personal information.

8. THIRD PARTY SITES

8.1 Although our Website or our Products may contain hyperlinks or banner advertising to or from external websites, those websites are not subject to our privacy standards, policies and procedures.

We recommend that you review the privacy policies of these third parties.

9. ACCESS / CORRECTION / TRANSFERAL / REMOVAL OF PERSONAL INFORMATION

9.1 We will use our reasonable endeavours to keep your personal information that we collect accurate, up-to-date and complete.

9.2 If you wish to access / transfer / correct / remove the personal information that we hold about you, than you may make a request by contacting us on hello@lubuto.io We will endeavour to respond within 21 days of receipt of your enquiry. If we deny access, we will provide you with the reason for such denial. We may recover from you our reasonable costs of supplying you with access to this information. Proof of identity may be required before such information will be provided.

10. DIRECT MARKETING

10.1 Where we have your express or implied consent, or where we are otherwise permitted by law, we may use your personal information to send you information about the promotions, products or services we offer, as well as other information. We may send this information by mail, email, SMS and telephone.

10.2 Should you no longer wish to receive these communications, you may unsubscribe at any time by email to team@lubuto.io or by using the unsubscribe facility that we include in our commercial electronic messages (ie email or SMS) to opt out of receiving those messages.

11. USE OF COOKIES

11.1 A cookie is a small piece of text that is placed within the memory of a computer and can be later retrieved by web page servers. When you visit our Website or use our Products, details are recorded about your use, such as time and date, your server address, pages accessed, time spent and type of browser. This information is used for analysis and to facilitate your use of the Website and Products. We may also work with third party service providers that use cookies to facilitate targeted advertising to you. If you do not wish to use cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used. If you reject our cookies, you may still use our Website and Products, but you may be limited in the use of some of the features and this may affect the functionality.

12. FEEDBACK / COMPLAINTS

12.1 Should you have any comments or complaints please email hello@lubuto.io.

13. CHANGES TO OUR POLICY

13.1 From time to time it may be necessary for us to review and revise this Policy. Any changes will be posted on our Website and on our Products, so please check back frequently.