

Privacy and Cookie Policy Form
Last Revised: June 27th 2017

Huddly AS (“**Huddly**”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the personal information we collect from users of our website, located at www.huddly.com (the “**Site**”). This Privacy Policy is applicable only to the information collected by Huddly via this Site; other Huddly web sites on the Internet may have different privacy policies and practices.

1. Questions; Contacting Huddly; Reporting Violations. If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or phone number:

Huddly AS
Attn: Customer Support
support@huddly.com

2. A Note to Users Outside of the United States. If you are a non U.S. user of the Site, by visiting the Site and providing us with data, you acknowledge and agree that your personal information may be processed for the purposes identified in the Privacy Policy. In addition, your personal information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. By providing your data, you acknowledge such transfer.

3. Types of Data We Collect. We collect personal information and anonymous information, as described below.

(a) Information You Provide to Us.

- We may collect personal information from you when you order products on our Site, such as your first and last name, e-mail and mailing addresses, and phone number.
- When you order products and/or services on our Site, our third party payment processor will collect all information necessary to complete the transaction, including your name, credit card information, billing information and shipping information. As of the date of this Privacy Policy listed above, we use Stripe as our third party payment processor. We do not processor, record, or maintain your credit card or bank account information. For more information on how payments are handled, or to understand the data security and privacy afforded to such information, if you are a U.S. resident, please refer to Shopify’s privacy policy at <https://www.shopify.com/legal/privacy>, or if you are a EEA resident, please refer to Stripe’s privacy policy at: <https://stripe.com/de/privacy>.

- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- When you participate in one of our surveys, we may collect additional profile information.
- We also collect other types of personal information that you provide to us voluntarily, such as requested information if you contact us via e-mail regarding support for the products you purchase via the Site.
- If you participate in a sweepstakes, contest or giveaway on our Site, we may ask you for your e-mail address and/or home number (to notify you if you win or not). We may also ask for first and last names, and sometimes post office addresses to verify your identity. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules for each sweepstakes and contest that you enter.
- We may also collect personal information at other points in our Site that state that personal information is being collected.

(b) Information Collected via Technology.

- Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor our Site to our users’ needs.
- Cookies. Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs. Our Site uses the following types of cookies for the purposes set out below:

Type of cookie	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. [For example, they allow you to log in to secure areas of our Site and help the content of the pages you request load quickly]. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

<i>Functionality Cookies</i>	These cookies allow our Site to remember choices you make when you use our Site, [such as remembering your language preferences, remembering your login details and remembering the changes you make to other parts of our Site that you can customise]. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.
<i>Targeted and advertising cookies</i>	<p>[These cookies track your browsing habits to enable us to show advertising that is more likely to be of interest to you. These cookies use information about your browsing history to group you with other users who have similar interests. Based on that information, and with our permission, third party advertisers can place cookies to enable them to show adverts, which we think, will be relevant to your interests while you are on third party websites.]</p> <p>[You can disable cookies that remember your browsing habits and target advertising at you by visiting http://www.youronlinechoices.com/uk/your-ad-choices. If you choose to remove targeted or advertising cookies, you will still see adverts but they may not be relevant to you. Even if you do choose to remove cookies by the companies listed at the above link, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored adverts from companies that are not listed.]</p>
<i>Social Media Cookies</i>	[These cookies are used when you share information using a social media sharing button or “like” button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Google+. The social network will record that you have done this.]

- Pixel Tags.** In addition, we use “**Pixel Tags**” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ personal information.

- Collection of Data by Advertisers. We may also use third parties to serve ads on the Site. Certain third parties may automatically collect information about your visits to this and other websites, your IP address, your ISP, the browser you use to visit our Site (but not your name, address, e-mail address or telephone number). They do this by using Cookies, Pixel Tags, or other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Site and the other sites tracked by these third parties. This policy does not apply to, and we are not responsible for, Cookies or Pixel Tags in third party ads, and we encourage you to check the privacy policies of advertisers and/or ad services to learn about their use of Cookies and other technologies. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: <http://www.networkadvertising.org>.
- Google Analytics. We use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics to improve our Site, products and services. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with your personal information. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. [You can find out more about how Google protects your data here: www.google.com/analytics/learn/privacy.html.] [You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available via this link: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>]

4. Use of Your Personal information

(a) **General Use.** In general, personal information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your personal information in the following ways:

- identify you as a user in our system;
- provide improved administration of our Site, products and services;
- provide the services you request;
- improve the quality of experience when you interact with our Site, products and services;
- send you an e-mail to verify your orders;
- send you administrative e-mail notifications, such as security or support and maintenance advisories;

- respond to your inquiries related to employment opportunities or other requests; and
- with your consent, send newsletters, surveys, offers, and other promotional materials related to our products and services and for other marketing purposes of Huddly.

(b) Creation of Anonymous Data. We may create anonymous data records from personal information by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of and improve Site navigation. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.

5. Disclosure of Your Personal information. We disclose your personal information as described below and as described elsewhere in this Privacy Policy.

(a) Third Party Service Providers. We may share your personal information with third party service providers to: provide you with the services that we offer you through our Site; to fulfill your orders; to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services to the Huddly.

(b) Affiliates. We may share some or all of your personal information with our parent company, subsidiaries, joint ventures, or other companies under a common control (“**Affiliates**”), in which case we will require our Affiliates to honor this Privacy Policy.

(c) Corporate Restructuring. We may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

(d) Other Disclosures. Regardless of any choices you make regarding your personal information (as described below), Huddly may disclose personal information if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Huddly; (c) to protect or defend the rights or property of Huddly or users of the Site; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

6. Third Party Websites. Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site, and another entity may collect personal information or anonymous data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your personal information after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

7. Your Choices Regarding Information. You have several choices regarding the use of information on our Service:

(a) Email Communications. We will periodically send you free newsletters and e-mails that directly promote the use of our Site. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.

(b) Cookies. If you decide at any time that you no longer wish to accept Cookies from our Site for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser’s technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Site or all functionality of the Site. If you have any questions about how to disable or modify Cookies, please let us know at the contact information provided below. Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com.uk.

(c) Do Not Track Signals. Some web browsers may transmit “do not track” signals to the websites and other online services with which your web browser communicates. There is no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise our policy on responding to these signals.

8. Changes to This Privacy Policy. This Privacy Policy is subject to occasional revision. When we update our Privacy Policy, we will update the “Last Updated” date at the top of this Privacy Policy. We may also notify you of the changes by sending you an email. Continued use of our Site following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

9. Provisions Specific to European Users.

(a) Who is the data controller? For the purposes of Directive 95/46/EC of the European Parliament (the "EU Directive") and any successor or equivalent legislation in the applicable jurisdiction, the data controller of your personal information (as defined below) is Huddly.

(b) What is “Personal Information?” For the purposes of this Privacy Policy, "personal information" (as outlined above), shall include any information by which you can be actually be identified or could be identifiable, whether simply from that information alone, or in combination with any other information which is in our control and includes “personal data” as defined in the EU Directive or any successor legislation or equivalent legislation in the applicable jurisdiction. Each reference to personal information in this Privacy Policy shall, for users based in Europe, be read as references to personal data.

(c) Sensitive Personal Information. Subject to the following paragraph, we ask that you not send us, and you not disclose, any sensitive personal information (e.g., social

security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Site or otherwise to us.

If you send or disclose any sensitive personal information to us when you submit user generated content to our Site, you consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such user generated content to our Site.

(d) International Data Transfer. We may store and process your data outside the EEA. The data, including personal information, that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, setting up and managing your account and the provision of support services. By checking the tick box at www.huddly.com you agree to this transfer, storing or processing. Huddly will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Retention. We will only retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy (approximately 24 months in order to fulfill warranty claims, if any), unless a longer retention period is required or permitted by law (for example for regulatory purposes).

(e) Your rights.

- **Opt-out.** You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) automated decision making and/or profiling; (iii) our collection of sensitive data; (iv) any new processing of your personal information we carry out beyond the original purpose; or (v) the transfer of your personal information outside the EEA. Please note that your use of some of the Site may be ineffective upon opt-out.
- **Your Ad Choices.** Some of the third party services providers and/or advertisers may be members of the Network European Interactive Digital Advertising Alliance ("EDAA") Self-Regulatory Program for Online Behavioural Advertising. To learn more, visit <http://www.edaa.eu/edaa-for-users> which provides information regarding targeted advertising and the "opt-out" procedures of EDAA members.
- **Access.** You may access the information we hold about you at any time via your account or by contacting us directly.
- **Amend.** You can also contact us to update or correct any inaccuracies in your personal information.
- **Move.** Your data is portable – i.e. you to have the flexibility to move your data to other service providers as you wish.
- **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.