

rebostoday Privacy Policy

Effective as of: September 19, 2022

We are rebostoday™, brought to you by Just Another Day, Inc. We provide a digital engagement community platform that is designed to enable you to interact with selected users and partners that wish to deliver various experiences to you, through your device. To do that, we need information about you. Protecting your privacy is really important to us. We only use your information where we have a legal basis to do so. This Privacy Policy will help you understand what information we collect, how we use it and what choices you have when you play any of our apps, use our websites, buy items from us, or take part in live events and promotions (the "**Services**").

Please note that in addition to the general information below, specific information about how certain of our Services use your information is provided at the end of this Privacy Policy in the "**App Specific Disclosures**".

You should also read our Terms of Service which set out the contract between you and JAD.

1. Who decides how your information is used?

Just Another Day, Inc. (hereinafter "JAD") is the data controller responsible for making decisions about how we use your personal information.

If you have any questions or comments on this policy, you can:

- Email us at privacy@rebostoday.com

2. The information we collect about you and how we use it

This Privacy Policy covers our use of any information that can or could be used to identify you ("**Personal Data**"). It does not cover information which cannot be used to identify you ("**Anonymous Data**").

We need to collect and use certain Personal Data to provide the Services to you and fulfil the promises we make to you in the Terms of Service:

- When you sign up for our Services you give us Personal Data voluntarily by providing it to us, for example when you sign up for an account. We collect and use that information in order to authenticate you when you register an account and use the Services, to make sure you are eligible and able to receive the Services, and so that you receive the correct version of the Services. That information includes the in-app username you choose to use on our Services, and internal account IDs that we assign to your account.
- You may have an account with a supported third party single sign-on service that allows use of our Services. As such, the Personal Data we collect also depends on which third party accounts you choose to use, their privacy policy, and what your privacy settings with those services allow us to see when you use their services to access JAD Services.
 - If you choose to link your Google account to the Services, we will collect your Google email address and an authentication token provided by Google.

- If you choose to link your Facebook account to the Services, we will collect a unique user ID provided by Facebook and, if permitted by you, your Facebook registered email address.

Depending on the particular Service you sign up for, we may support other third party single sign-on services and collect additional Personal Data from them. For details please read the App Specific Disclosures at the end of this Privacy Policy.

Some third-party providers may notify you that they make additional information, such as your public profile, available to us when you use their single sign-on services. We do not collect that information from them.

- We collect and use your device location information as you use our Services (and, if you elect to turn on background location tracking for our Services, while you are not directly interacting with the Services), including how you move around and events that occur during app use. Our Services include location based apps whose core feature is to provide a app-play experience tied to your real world location, so we need to know where you are to operate these apps for you, and to plan the location of in-app resources (for example local content within the rebostoday app). We identify your location using a variety of technologies, including GPS, the WiFi points you are accessing the Service through and mobile/cell tower triangulation.
- We also collect and use your in-app actions and achievements, as well as certain information about your mobile device (including device identifiers, device OS, model, configuration, settings and information about third party applications or software installed on your device), to operate the Services for you and to ensure that we provide a fair user experience to all players in accordance with our Terms of Service (which includes anti-fraud and anti-cheating measures against behaviors prohibited under our Terms of Service).
- We also use the information above to show in-app sponsored locations that are in your vicinity as part of the app use experience.
- We further use the information above in order to provide technical and customer support to you.
- You also give us Personal Data when you make a purchase through us, subscribe to our publications, register for a live event, enter a competition, promotion, sweepstakes or survey or communicate with us. Depending on which of these Services you use, that may include your name, mailing address, phone number, country of residency, date of birth (as needed to verify eligibility), and email address. We use that information to fulfil those Services to you and to provide related customer support to you.

In addition, we have and rely on a legitimate interest in using your Personal Data as follows:

- Using your IP address, browser type, operating system, the web page you were visiting before accessing our Services, the pages of our Services which you browsed or the features you used, and the time spent on those pages or features, the links on our Services that you click on, device and advertising identifiers, as well as actions you take during app use, your in-app user settings and preferences and your in-app purchases to understand who is using our Services and how.

- Using your contact information, namely your email address in order to communicate with you to provide technical and customer support.
- Using your internal account ID in order to attribute to your account any user content (such as local points of interest).
- Using your email address and device information in order to share updates and news about the Services with you either within the apps or by email. You can unsubscribe from these at any time in your device settings.
- To provide social features within our apps so you can interact with other users, including storing your communications with those users, find your friends and be found by them, and share your app experience and achievements with your friends.
- To offer new or additional features for our Services.
- To organize and run live events based on or featuring our apps. Note that when you participate in live events your in-app actions and achievements, in-app username and your avatar, and other components of your in-app profile will be visible to other event participants and to the public (for example on leaderboards displayed at the event and online).
- To carry out anti-fraud and anti-cheating measures and to ensure that you and other users are complying with our Terms of Service.
- To make legal or regulatory disclosures.

We will only use your Personal Data to do the following if we have your consent:

- If you elect to turn on background activity tracking in our Services we will collect your Personal Data as you use the Services as well as in the background when you do not have the Services open on your device. This may include your device location and your fitness activity data (such as Step Count, Calories Burned, and Distance Walked). We use background activity tracking to provide you certain functionalities in the Services such as in-app items and opportunities that may be of interest to you such as alerts for nearby events and collectibles. You can change your mind and turn off background activity tracking at any time in your device settings.
- Send you marketing materials by email or via in-app notifications. You can unsubscribe from these at any time in your device settings.

We also rely on your consent where we use cookies or similar technologies. Insofar as cookies collect Personal Data, we will process it only based on your explicit consent, in anonymized form, or under a pseudonym.

While you may disable the usage of cookies through your browser settings, JAD currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to the lack of industry standard on how to interpret that signal.

3. Who we share information with

We will not share any Personal Data that we have collected from or regarding you except as described below:

Information Shared with Our Services Providers. We may engage third party service providers to work with us to administer and provide the Services. As part of that they will process your Personal Data on our behalf. These third party service providers have access to your Personal Data only for the purpose of performing services on our behalf, in compliance with this Privacy Policy, and we make sure each one is contractually obliged not to disclose or use your Personal Data for any other purpose. The service providers we use help us to:

- run, operate and maintain our mobile apps through third party platform and software tools;
- perform content moderation and crash analytics;
- run email and mobile messaging campaigns;
- perform app and marketing analytics;
- administer live events, competitions, sweepstakes and promotions, including registering users, managing check-in and attendance, verifying eligibility and prize fulfilment;
- provide technical and customer support; and
- process payments for purchases.

Some third party service providers may also collect information directly from you (for example, a payment processor may request your billing and financial information) as a Third Party Service in accordance with their own privacy policy. Such third party service provider does not share your financial information, like credit card number, with JAD, but it may share limited information with us related to your purchase, like your zip or postal code.

Information Shared with Other Users. When you use the Services, and in particular when you use our apps, use social features within those apps, or take part in live events, we may share certain Personal Data with other users. This Personal Data includes your in-app profile (such as your username, your avatar), your in-app actions and achievements, the real-world location of app-use resources you interacted with when playing the apps (for example JAD “Yana Drops”), and your public in-app messages. For more details please read the App-Specific Disclosures at the end of this Privacy Policy.

Information Shared with Third Parties. We may share Anonymous Data with third parties for industry and market analysis. We may share Personal Data with our third-party publishing partners for their direct marketing purposes only if we have your express permission. We do not share Personal Data with any other third parties for their direct marketing purposes.

Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We only share information about you to government or law enforcement officials or private parties when we reasonably believe necessary or appropriate: (a) to respond to claims, legal process (including subpoenas and warrants); (b) to protect our property, rights, and safety and the property, rights, and safety of a third party or the public in general; and (c) to investigate and stop any activity that we consider illegal, unethical, or legally actionable.

Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including Personal Data, is a business asset. If we are acquired by a third party as a result of a

transaction such as a merger, acquisition, or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your Personal Data, will be disclosed or transferred to a third party acquirer in connection with the transaction.

4. How your Personal Data is transferred

JAD may operate its Services across the globe. Your Personal Data could be transferred and stored in a country outside of your home country. The data protection laws in these countries may not be the same as in your home country.

If we transfer your Personal Data from the USA to other countries, we will endeavor to utilize countries, contracts, and service providers that provide a similar degree of protection to your Personal Data as within the USA.

5. How we keep your Personal Data safe

We have appropriate security measures in place to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, improperly altered or disclosed. We also limit access to your Personal Data to employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality. We will notify you and any applicable regulator of a breach where we are legally required to do so.

6. How long we will keep your Personal Data

We keep your Personal Data for as long as we need to provide the Services to you and fulfil the purposes set out in this Privacy Policy. This is also the case for anyone that we share your information with and who carry out services on our behalf.

When we no longer need to use your Personal Data and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize it so that it can no longer be associated with you. When removing Personal Data, we will take commercially reasonable and technically feasible measures to make said Personal Data irrecoverable or irreproducible.

7. Your rights and choices

You have certain rights in relation to your Personal Data. In order to exercise these rights, please contact us at privacy@reboostoday.com.

You can:

- Request access to the Personal Data we hold on you.
- Delete or correct your Personal Data. The easiest way to update your account information is via your in-app settings. You can also submit a customer support request by emailing us at privacy@reboostoday.com
- Object to us processing your Personal Data. Some of the Personal Data we hold is necessary for us to provide the Services to you and fulfill the promises we make to you in the Terms of Service.

- Ask us to stop using your Personal Data, including for marketing and promotional purposes (but be aware that sometimes we need to use your Personal Data in order for you to use the Services).
- Have your Personal Data transferred to another organization (where it is technically feasible).
- Complain to a regulator. We'd appreciate the chance to deal with your concerns directly so we'd prefer you to contact us first at privacy@reboostoday.com

The law provides exceptions to these rights in certain circumstances. Where you cannot exercise one of these rights due to such an exception, we will explain to you why.

We offer you choices regarding the collection, use, and sharing of your Personal Data and we'll respect the choices you make. Please note that if you decide not to provide us with the Personal Data that we request, you may not be able to access all of the features of the Services.

We aim to provide the information or complete the outcome you request within 30 days.

8. Children

Unless stated otherwise for a particular Service, children are not allowed to use the Services, and we do not collect Personal Data from them. We define "children" as follows:

- Residents of the EEA: anyone under 16 years old, or the age needed to consent to the processing of personal data in your country of residence.
- Residents of the Republic of Korea, anyone under 14 years old.
- Residents of other regions: anyone under 13 years old

For Services that permit Child participation, parents or legal guardians ("Parents") must provide verified consent. Parents can provide and verify their consent through the in-app onboarding process, or through another authorized third-party provider made available through the Service. Where Parental consent is required, JAD recommends that Parents monitor the Child's online activity and use of the Service.

Verifiable parental consent is required for the collection, use, or disclosure of a child's Personal Data. JAD will not collect, use, or disclose any Personal Data from a child if their parent or guardian does not provide such consent.

Once verified, a parent can consent to their child creating a user account and accessing the Service. For user account creation, JAD will collect the in-app username the child chooses to use on our Services, internal account IDs that we assign to the child's account, and the child's personal email address. We need that information to authenticate the child's account, to make sure the child is eligible and able to receive the Services, and so that the child receives the correct version of the Services. As the child accesses and uses the Service, JAD will also collect the child's device location and other Personal Data listed in this Privacy Policy for the purpose of operating and providing the Service to the child, as described in this Privacy Policy.

Parents have the right to refuse further collection, use, and/or disclosure of their child's Personal Data by notifying us. As a parent, you understand that JAD has a legitimate interest in providing your child's

Personal Data collected via the Services to third party providers for the sole purpose of administering or providing the Services, as described in Paragraph 3 of this Privacy Policy.

If we learn that we have collected Personal Data of a child, and we do not have parental consent, we aim to take steps to delete such information from our files as soon as possible.

9. Changes to this Privacy Policy

Any Personal Data that we collect is covered by the Privacy Policy in effect at the time such information is collected. We may make changes to this Privacy Policy from time to time. You will be given reasonable notice of any material change.

10. Third Parties

In using our Services you may access links to websites and services that are owned or operated by third parties (each, a "**Third Party Service**"). Any information that you provide on or to a Third Party Service or that is collected by a Third Party Service is provided directly to the owner or operator of the Third Party Service and is subject to the owner's or operator's privacy policy. We're not responsible for the content, privacy, or security practices and policies of any Third Party Service. To protect your information we recommend that you carefully review the privacy policies of all Third Party Service that you access.

11. App Specific Disclosures

Additional Privacy Information for rebostoday app, powered by JAD

By accepting this agreement, the user is certifying that they are older than 13 years of age. Users who are not able to certify that they are 13 years shall not access these Services.