

SCALARR PRIVACY POLICY

Updated: May 31, 2018

Scalarr, Inc. ("**Scalarr**" or "**We**") respect your privacy and is committed to protecting your privacy and ensuring you have a positive experience on our website and in using our products and services (collectively, the "**Services**"). This policy covers the Scalarr website scalarr.io and software and is applicable worldwide.

We respect the privacy of our partners, customers and their end users, and believe in enabling them to make informed choices about the use of their personal data, including by explaining our practices and providing appropriate ways to exercise their privacy rights. Taking the importance of your privacy into consideration, we have created and enacted this privacy policy to help you understand our privacy practices. This policy outlines our handling practices and how we collect and use the Personal Data you provide during your online and offline interactions with us and our Services. As used in this Privacy Policy, "**Personal Data**" means any information that can be used to individually identify a person, and may include, but is not limited to, name, email address, postal or other physical address, title, and other personally identifiable information.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to this privacy policy. This policy may be updated from time to time for reasons such as operational practices or regulatory changes, so we recommend that you review our Privacy Policy when returning to our website or using our Services.

Scalarr's Services

Scalarr's Services enable mobile companies and developers (our "Customers") to analyze data regarding their mobile advertising campaigns and detects unsolicited fraudulent installs.

Scalarr has no direct relationship with its Customers' End Users, or with any other individuals whose personal data we may process on our Customers' behalf.

Collection of your Personal Data

We collect several types of information from and about our partners, customers and their end users who visit our Website or use our Services via internet connection or through your device which you use to access our Services, including certain user details.

1. We collect the following categories of Personal Data about you when you use or otherwise interact with our Services:

- Name
- Title
- Email address
- Home/work/mobile telephone number
- Postal or other physical address
- Logs and communication data
- Resources on our website which you access and use
- Facebook profile information (when you use Facebook to log-in to our Services or to create an account for our Services)
 - IP addresses and other information collected passively through cookies, web-beacons and other tracking technologies.

2. End Users Data received from our Customers

Scalarr's Customers use our Services to analyze the data regarding their mobile advertising campaigns and detects unsolicited fraudulent installs, and for such purpose upload to Scalarr's service certain data regarding their End Users. Such data is provided to Scalarr by the Customer, by the Customer's integration and implementation of Scalarr's APIs into the Customer's tracking-analytics system. The data we receive from Customers refers to downloads, clicks and installations of their mobile applications, mobile device use and data regarding in-app events.

Once such data parameters are uploaded by our Customers to the Services, they enable us to provide the Services to our Customers and enable the Customers to analyze their mobile advertising campaigns and detects unsolicited fraudulent installs.

3. We collect and/or process your Personal Data in connection with the below activities related to our Services:

- Account registration
- Services features usage
- Use of certain Service
- Generating reports based on information collected from use of our Services
- Requesting service and support for our Services and providing such support
- Placing transactions or orders
- Registering to attend a seminar or webinar
- Participating in an online surveys
- Billing and collecting payments for our Services
- Registering for newsletter subscriptions
- Customizing the advertising and content you see

4. Cookies and Other Tracking Technologies

Scalarr and our partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and gather information about our user base, such as location information based on IP addresses. Users can control the use of cookies at the individual browser level.

Some third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Processing of your Personal Data

We will use your Personal Data only in accordance with our Privacy Policy. If you do not wish us to continue using your Personal Data in this manner, you can request that your account be deactivated by contacting us as specified in the "Contact Us" section. If you would like to opt-out of receiving any information that you receive from us, you may update your email preferences by using the "UNSUBSCRIBE" link found in emails we send to you.

The personal data collected or processed through our Services (concerning either our Customers, their End Users, our Partners or visitors to the Scalarr website) will be used for:

- a. Processing your orders and providing you with access to the Site and the Services
- b. Improving and maintaining our Services (e.g. for power predictive ML features)

- c. Providing reports based on information collected from use of our Services
- d. Communicating with you in relation to the purposes for which you provided your contact details and in relation to similar products or Services.
- e. Keeping you up to date on the latest Service announcements, software updates and upgrades, system enhancements, special offers, and other related information
- f. Providing and administer opt-in contests or other marketing or promotional activities on the scalarr.io or affiliate websites
- g. Personalizing marketing communications and website content based on your preferences, such as in response to your request for specific information on products and services that may be of interest
- h. Providing support and assistance for our Services
- i. Providing the ability to contact you and provide you with shipping and billing information
- j. Complying with our legal obligations, resolving disputes with users, enforcing our agreements
- k. Creating aggregate data and anonymous data (as specified below)

By analyzing the data we receive, we may compile aggregate and anonymized data ("Aggregate Data"). Aggregate Data is anonymous and is not linked to any personal data. Aggregate Data helps understand trends and customer needs so that new services can be considered and so existing products and services can be tailored to customer desires.

Choices About How We Use and Disclose Your Information

You can choose whether to provide Personal Data to Scalarr, but note that you may be unable to access certain options, offers, and services if they require Personal Data that you have not provided.

a. Opt-out. You can sign-up, and therefore consent, to receive email or newsletter communications from us. If you would like to discontinue receiving these communications, you can update your preferences by using the "Unsubscribe" link found in such emails or by contacting us using the information in the "Contact Us" section of this policy. If you opt out, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations.

b. Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

c. We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data.

Sharing your Personal Data

We do not sell or rent your Personal Data in personally identifiable form to anyone.

We share Personal Data within Scalarr, and with third party service providers for purposes of data processing or storage.

How We Protect Your Data

The security of your personal information is important to us. Scalarr is committed to protecting the Personal Data you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Data from unauthorized access, use or disclosure.

Whilst we take appropriate technical and organizational measures to safeguard the personal information that you provide to us, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer over the Internet to us. We recommend you take every precaution in protecting your Personal Data when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser.

If you have any questions about the security of your Personal Data, you can contact us at privacy@scalarr.io.

Linked websites and third party services

While navigating Scalarr's website or Services, you may be directed to content or functionality that is hosted by a third-party. When information is collected on behalf of Scalarr exclusively, Scalarr's Privacy Policy will be referenced and will govern how your information is used. For other, non-Scalarrs sites or services, the site/service owner's privacy policy will be referenced. You should review such third party's privacy and security policies prior to use.

Commitment to Protecting Children's Privacy

Scalarr does not knowingly collect or process personal data from or with respect to children under the age of 16, and you must be 16 years of age or older in order to establish an account for Scalarr's Services.

If you are under 16, please do not attempt to use the Site or register for the Services or send any information about yourself to us, including your name, address, telephone number, or email address. No one under age 16 may provide any personal information to us or use the Site or the Services. In the event that we learn that we have collected personal information from a child under age 16, we will delete that information as quickly as possible unless your parent or guardian has provided us with their consent for your use of our Site or Services.

If you are a parent or legal guardian and believe that your child under the age of 16 has submitted his or her personal data or other data without your consent, permission, or authorization – please let us know immediately, and we will promptly act to remove your child's data from our database, cease the use of such data and inform any other party we suspect to have access to such data to do the same.

EU-U.S. Privacy Shield

In accordance with Art. 32 GDPR and Amendments, Scalarr will adopt and maintain appropriate (including organizational and technical) security measures in dealing with Principal's Data in order to protect against unauthorized or accidental access, loss, alteration, disclosure or destruction of such data, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing:

Scalarr's Service is hosted by service providers which comply with the EU-U.S. Privacy Shield Framework (the "Privacy Shield") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the EEA to the U.S - <http://www.privacyshield.gov>.

Scalarr has entered into EU standard contractual clauses (“Model Contracts”) for transfers of Personal Data to its affiliates. You can request a copy of these Model Contracts by submitting your request via email to privacy@scalarr.io.

In compliance with the Privacy Shield Principles, Scalarr commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Scalarr at:

Scalarr Inc., 1013 Centre Road, Suite 403-B, Wilmington DE 19805, United States
or by sending an email to privacy@scalarr.io at any time.

Changes to Our Privacy Policy

We may update this privacy policy to reflect changes to our information practices. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

To address your individual rights or if you have any privacy-related questions or comments related to this privacy policy, please send an email to privacy@scalarr.io. You can also contact us by writing to this address: Scalarr Inc., 1013 Centre Road, Suite 403-B, Wilmington DE 19805, United States.