



BubbleGrid

PRIVACY POLICY

Effective date: Sep 1,2023

Introduction:

This "Privacy Policy" describes how BubbleGrid ("BubbleGrid", "we", "us", or "our") protects your privacy when you use BubbleGrid and all mobile phone and web applications developed by 10happy Technology Development (Dalian) Co.,Ltd., Inc.

This Privacy Policy applies to information (including personal information) collected through the BubbleGrid Services. For the purpose of this Privacy Policy, "personal information" means information that identifies you personally, either alone or in combination with other information available to us. Personal information does not include technical, device, or usage information that cannot be used to identify you personally even if we combine it with other data about you, nor does it include "aggregate" information, which is data we collect about the use of the BubbleGrid Services or about a group or category of services or users, from which individual identities or other personal information have been removed. This Privacy Policy in no way restricts or limits our collection and use of aggregate and non-personal information, and we may share such data about our users with third parties for various purposes. This Privacy Policy is part of and incorporated into BubbleGrid's Terms of Service ("Terms of Service").

1. Acceptance of this Policy

By accessing, visiting or using our Services, you warrant and represent that you have read, understood and agreed to this Policy and our Terms of Service. If you disagree with anything in this Policy, you must not use or access the Services.

2. Amendments to this Policy

We may periodically make changes to this Policy as we update or expand our Services. We will notify you of any material changes to this Privacy Policy by notifying you via the email we have on file for you, or by means of a notice on our Services in advance of the effective date of the changes. If you do not agree to the changes, you should discontinue your use of the Services prior to the time the modified Policy takes effect. If you continue using the Services after the modified Policy takes effect, you will be bound by the modified Policy. Furthermore, we may provide you with "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. These notices may provide more

information about our privacy practices, or provide you with additional choices about how we process your personal information.

3. What Data We Collect & How

The information we collect from you includes the country you set your device to, the language you use on your device, the type and version of the operating system of your device, and your device model. If you make any in-app purchases, we will also collect the product IDs of the items you purchase.

We collect this information from you to improve our app's overall performance and the service.

With your permission in the application, we may access your device's photo library.

In this Policy, the term "personal information" includes any information that identifies or makes an individual identifiable. When you access or use our Services, we may generally collect the personal information described below. Please note that we need certain types of information so that we provide the Services to you.

- ① Information You Directly and Voluntarily Provide to Us
- ② Automatically Collected Information for Legitimate Interests

① Information You Directly and Voluntarily Provide to Us

You consent to provide some or all of the following Personal Information when you create an account on the Apps or use our Services, such as uploading contents on the Apps or contact us for technical support:

- Registration information, such as your email address, phone number or other contact information, password, user identifier and language.
- Profile Information: such as an avatar or profile picture, gender, birthday, nickname or username, or country.
- User-generated contents: such as comments, texts, messages, pictures, images, videos, sounds, code, your device's camera and microphone or other data or materials that you upload and distribute on the App when you use our Service.
- Payment Information: such as full name, billing address, billing zip code, billing country, date of birth, purchase amount, payment method, credit or debit card number, or other payment information where required for payment.
- Your Global Positioning System information, after you permit us to do so but you may change the access to your GPS information via the settings on your mobile device.
- Your opt-in choice and correspondence with us, such as information used to verify with your account or to resolve your feedback or complaints.
- Customer Support Information: If you are a visitor to the Site, or a user of the Apps, we may collect information that you provide to us when you communicate with any of our departments such as customer service or technical services.

- Social Media Account Information: the information that you provide from social media when you sign up with a third-party social media, such as Facebook, Google, Instagram, Twitter, Wechat, or if you link your account with a third-party social media account.

② Automatically Collected Information for Legitimate Interests

We may automatically collect some or all of the following Personal Information about you when you use our Services for legitimate interests:

- Network Connection: your type of network information such as your mobile network, Wi-Fi connection and others.
- Information from Other Sources: We may obtain additional information from third parties and sources other than our Service. For example, we may obtain additional information from social media network for which you have approved our access. When you access our Service through social media networks or when you sign up our Service with a third-party social media, you are authorizing us to collect, store, and use such additional information and content in accordance with this Privacy Policy.
- Device Information: such as your mobile device's brand, model, operating system, resolution, screen size, system version, Bluetooth settings, language setting, internet connection, random-access memory ("RAM"), the application you have installed, the applications you have running in the background, mobile device's advertising ID, Internet Protocol(IP) address, MCC, MNC and media access control address.
- Information regarding your access to and use of other apps.
- Other location information: the general location of your mobile device (not precise geolocation data), such as the information based on your SIM card.
- Mobile advertising identifiers, which are used by mobile operating system and made available to advertising providers to gather metrics on mobile apps(Apple's IDFA or Google's AAID) to help us and advertisers provide Ads that may be more relevant to your interests.
- Metadata, associating with the User-generated content you provided us, describes other data and provides information about how, when, and by whom the pieces of User-generated content were collected and how that User-generated content was formatted, such as hashtags used to label the keywords to the photo and captions.
- Cookies & Similar Tracking Information: We use cookies and similar tracking technologies to collect information about your interactions with our Services. The information we collect includes, but is not limited to, account activation time, content displayed to you and whether you clicked on it, advertisements displayed to you and whether you clicked on them, URLs you have visited, notifications that have appeared on your mobile device, your Internet Protocol ("IP") address, your mobile country code, and your user ID.

How We Use Your Personal Information

We use personal information collected through the BubbleGrid Services with your permission:

- to communicate with you or third parties;

- to process your requests and transactions;
- to improve the BubbleGrid Services;
- to customize the services and/or products we provide to you;
- to assist with our product and service development;
- to perform marketing activities;
- to provide relevant advertising such as showing you ads that are tailored for you;

We will only use your Personal Information when the applicable laws allow us to . In general ,we use the personal information we gather through the Services for the purposes described below. If we use your personal information in any other ways, we will disclose this to you. You can choose not to share your information with third parties for marketing purposes, or from allowing us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your consent. If you choose to limit the ways we can use your personal information, some or all of the Services may not be available to you.

- To provide the Services to you. We require certain information from you in order to provide you with the Services you requested. Such information may include your contact and device information. We share this information with our service providers or partners to the extent necessary to continue to provide you with the Services. We cannot provide you with Services without such information.
- To provide customer service. We process your personal information when you contact us to help you with any questions, concerns, disputes or issues, or to provide us with your feedback. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.
- To enforce terms, agreements or policies. To ensure your safety and adherence to our terms, agreements or policies, we may process your personal information to: actively monitor, investigate, prevent and mitigate any alleged or actual prohibited, illicit or illegal activities on our Services; investigate, prevent, or mitigate violations of our terms and policies; enforce our agreements with third parties and partners; and, collect fees based on your use of our Services. We cannot perform our Services in accordance with our terms, agreements or policies without processing your personal information for such purposes.
- To send you Service-related communications. We use your contact information to send you administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information to you. Service-related communications are not promotional in nature. You cannot unsubscribe from such communications because you could miss important developments relating to your account or the Services that may affect how you can use our Services.
- For security purposes. We process your personal information to: improve and enforce our security measures; combat spam, malware, malicious activities or security risks; and to monitor and verify your identity so that unauthorized users do not access your account with us. We cannot ensure the security of our Services if we do not process

your personal information for security purposes. Designated Countries: For all purposes listed above, pursuant to the EU General Data Protection Regulation ("GDPR") or any equivalent legislation (collectively "Data Protection Laws"), we process the personal information of users located in the European Economic Area ("EEA"), United Kingdom and Switzerland (collectively, the "Designated Countries") based on our contract with you.

- To maintain legal and regulatory compliance. We process your personal information to pay our taxes or fulfill our other business obligations, and/or to manage risk as required under applicable law. We cannot perform the Services in accordance with our legal and regulatory requirements without processing your personal information for such purposes. Designated Countries: Pursuant to the Data Protection Laws, we process the personal information of users located in the Designated Countries to comply with our legal obligations.
- To personalize your experience on the Services. We allow you to personalize your experience on our Services via social media plugins on our Services (e.g., Facebook, Google, Instagram, Twitter, Wechat, etc.), by keeping track of your preferences (e.g., nickname or display name, time zone, language preference, etc.), and more. Without such processing, you may not be able to access or personalize part or all of our Services. Designated Countries: Pursuant to the Data Protection Laws, we process the personal information of users located in the Designated Countries to satisfy our legitimate interests as described above.
- To conduct research and development. We process information about the way you use and interact with our Services to: help us improve our Services; build new Services; and build customized features or Services. Such processing ensures your continued enjoyment of part or all of our Services. Designated Countries: Pursuant to the Data Protection Laws, we process the personal information of users located in the Designated Countries to satisfy our legitimate interests as described above.

4. With Whom We Share Your Personal Information

We won't sell your personal information. Also, we may disclose the personal information we collect through the BubbleGrid Services when we, in good faith, believe disclosure is appropriate to:

comply with applicable law (e.g., in response to a valid court order or subpoena);
prevent or investigate a possible crime, such as fraud or identity theft;
enforce the Terms of Service or other agreements that govern your use of the BubbleGrid Services and/or any of our other services;
to protect the rights, property or safety of us, our users or others; or
to protect your vital interests.

If we are going to release your information in response to a legal process, our policy is to provide you with reasonable advance notice under the circumstances unless we are prohibited from doing so by law or court order. We may disclose your information without

giving you prior notice if we believe it is necessary to prevent imminent and serious bodily harm to a person. Nothing in this Privacy Policy is intended to limit any legal objections or defenses you might have to efforts by third parties to compel disclosure of your information, including legal orders from the government. Your personal information and other data collected by us may be transferred to another company that has acquired our stock or assets, for example, as a result of a sale, merger, reorganization, dissolution or liquidation. If such a transfer occurs, the acquiring company's use of your personal information will still be subject to this Privacy Policy.

5. DATA RETENTION

We will delete your personal data immediately upon request unless we are required to retain your data for legal reasons or for any of the other reasons listed for disclosure in “With Whom We Share Your Personal Information” above.

6.Children’s Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

7.Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By Email: bubblegridhelp@hotmail.com