

# Privacy Policy

Effective: September 1, 2020

This Privacy Policy (the “**Policy**”) details how Happy Cabbage Analytics, Inc. (“**Happy Cabbage**,” “we,” “us,” or “our”) collects, uses, processes, and transfers Personal Information (defined below) collected as part of its business. Happy Cabbage collects this information in order to provide services to its customers, and to improve the customer experience in the markets in which it operates. Please read this Policy carefully to understand our Policies and practices regarding your information and how we will treat it. This Policy may change from time to time, so please check this website periodically for updates.

We do not sell Personal Information.

## Collection

Sources of Personal Information. We collect information that identifies, relates to, or could reasonably be linked with a natural person or a household (“**Personal Information**”) from a variety of sources, including:

- Directly from you.
- From sources on the internet, such as networking sites or job portals.
- From our customers’ point-of-sale systems.
- From representatives of prospective customers.
- From representatives of vendors and suppliers.
- From our partners and affiliates who have lawfully collected and transferred your information to us.
- From users of our platform.
- From third-party service providers.
- From devices, including computers and phones, which have accessed, downloaded, installed, or in any other way used our applications or other services.

From You. When you visit our website, we may collect and process information including the following:

- Data that you submit when filling out forms on our website, including information that you may provide when (a) inquiring about our services, downloading collaterals, signing up for events, providing feedback, or when participating in our opinion surveys, or (b) inquiring about a position with our company.
- Data that is submitted automatically while you interact with our website, such as IP address, cookies data (including data about the products and services you use, which may include device-specific information such as the operating system, hardware version, device settings, file and software names and types, battery and signal strength, and device identifiers), location data, and connection information
- Usage data on how the website is being browsed and used, including diagnostic data such as your browser application, browser version, pages visited, your computer’s IP address, date and time of visit, time spent on individual pages, and device accessed from.

From Customers and Third-Party Partners. To provide services to our customers, we may collect and process certain categories of Personal Information. The Personal Information we collect may include, if available:

- First name and last name
- Email address
- Driver’s license number
- Address

- Cell phone number
- Purchasing / consuming history
- Other financial, medical, or health insurance info
- Records of products or services purchased, obtained, or considered
- Geolocation data
- IP address
- Date of birth
- Gender

In addition to the individual pieces of information above, we also draw inferences from that information to predict customer preferences, characteristics, trends, attitudes, and behavior.

### **Usage**

We use the information we have to deliver our products and services to customers, to improve them, and to personalize features and content and to make personalized product suggestions for you. To create personalized services and products suggestions that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others (including any data you choose to provide); how you use and interact with our services; and the people, places, or things you're connected to and interested in. The following are examples of how we use the above Personal Information:

- To provide products and services to our customers;
- To track how customers use our platform in order to improve our services;
- To identify potential customers who may benefit from our business;
- To communicate with you in response to queries submitted via online forms;
- To understand customer preferences, interests, and buying patterns;
- To inform customers about products, sales, and promotions;
- To understand buying patterns based on geographical location;
- Monitoring our website performance and fine-tuning our offerings;
- To optimize delivery services;
- To understand differences in customer behavior among customer groups;
- To comply with and in order to assess compliance with applicable laws, rules and regulations, and internal Policies and procedures;
- To track employee performance within the industry; and
- For our own internal hiring decisions.

### **Transfer and Sharing**

We use the information we have (including your purchasing history) to help customers and other partners measure the effectiveness and distribution of their ads and services, understand the types of people who purchase their products or services, and understand how people interact with their websites, apps, and services. Specifically, we share Personal Information in the following ways:

- We may use service providers, who help with parts of our website and operation of our business; (e.g. bill collection, fraud prevention, technology services, marketing) and with whom we may share your Personal

Information. We endeavor via contract to limit our service providers' use of such information to the purposes of providing services to, or assisting us with, the operation of our business and not for their own benefit;

- We may share with law enforcement, government officials, or other third parties to the extent we believe applicable law requires our sharing or such sharing is appropriate to protect our rights, your rights or the rights of others;
- We may share payment information with third parties such as financial institutions as part of providing our services to you or the business you work for;
- We may share in order to manage any proposed sale, restructuring, transfer, or merger of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organization; and
- We may share aggregated data that does not reveal Personal Information with other third parties consistent with our business purposes.

We do not sell Personal Information, nor do we intend to do so, as those terms are defined in California law. In addition, we do not share Personal Information with third parties for their direct marketing purposes.

### **Ownership, Security, and Retention of Data**

All data we collect, utilize, or that is provided to us is solely owned by Happy Cabbage. In specific circumstances, we may amend or provide an alternate data ownership agreement.

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our website.

We will retain your Personal Information for as long as necessary for the purposes for which we collect it. In some instances, we may keep it longer:

- for as long as necessary to comply with any legal requirement;
- for backup and disaster recovery systems in accordance with our backup and disaster recovery Policies and procedures;
- for as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies; or
- for data that has been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, indefinitely.

### **Changes to This Privacy Policy**

We may change this Policy at any time. It is our Policy to post any changes we make to our Policy on this page with a notice that the Policy has been updated on our website's home page. If we make material changes to how we treat Personal Information, we will post a notice of the change on our website's home page. The date this Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this Policy to check for any changes.

### **Contact Information**

If you have any questions, concerns, complaints or suggestions regarding this Policy, have any requests related to your Personal Information pursuant to applicable laws, or otherwise need to contact us, you may do so using the contact information below or through the "Contact" tools on our website. To Contact Happy Cabbage:

Happy Cabbage Analytics, Inc.

Attn: Data Privacy Request  
 631 Folsom St. Apt. 9F  
 San Francisco, CA 94107  
 (443) 668-9972 | info@happycabbage.io

Without prejudice to any other administrative or judicial remedy you might have, you may have the right to lodge a complaint with local state regulators/data protection authorities if you believe that we have infringed applicable privacy or data protection requirements when processing personal data about you.

## For California Residents

### Collection, Use, and Sharing of Personal Information

The Personal Information about you that we collect includes information within the below categories of data. These categories also represent the categories of Personal Information that we have collected over the past 12 months. Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services and products we provide you, we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category for all of our customers. We do not and will not sell Personal Information about you, as defined under California state law, nor have we done so for the last 12 months.

<b>Categories of Personal Information we collect may include:</b>	<b>Examples of how Personal Information is used include:</b>	<b>Parties with whom your information may be shared include:</b>
Personal identifiers and device identifiers;  Commercial information;  Electronic network activity information, including information about content you view or engage with;  Location-related information, including precise device location;  Professional or employment information, if you choose to provide it in response to a job announcement;  Education information, if you choose to provide it in response to a job announcement;  Information derived from other Personal Information about you, which could include your preferences, interests, and other information used to personalize your experience.	Providing, personalizing, and improving our products and services;  Facilitating transactions, providing measurement, analytics, advertising, and other business services;  Promoting safety, integrity, and security;  Communicating with you;  Researching and innovating for our products and services; and  To fulfill other business purposes.	Apps, websites, and third-party integrations on or using our products or services;  New owners in the event of a merger, acquisition, or similar type of transaction;  Our business partners, including partners who use our analytics services, advertisers, measurement partners, partners offering goods and services, vendors and service providers, and researchers and academics; and  Law enforcement or other third parties in connection with legal requests.

### Sources of Personal Information

We receive Personal Information from the information that you and others provide, your device(s), and from our partners. The categories of sources from which we've collected or received Personal Information include:

- Directly from you, for example when you input information into a form on our website.
- From sources on the internet, such as networking sites or job portals.
- From our customers' point-of-sale systems.
- From prospective customers.
- From vendors and suppliers.
- From our partners and affiliates who have lawfully collected and transferred your information to us.
- From users of our platform.
- From third-party service providers.
- From devices, including computers and phones, which have accessed, downloaded, installed, or in any other way used our applications or other services.

### Your Rights Under the CCPA

Under the CCPA, you have the following rights:

- **Right to Know:** You have the right to request that we disclose to you the Personal Information we collect, use, or disclose, and information about our data practices;
- **Right to Request Deletion:** You have the right to request that we delete your Personal Information that we have collected from you;
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of these rights.

To exercise any of the above rights, **click here** [insert link to online form or to send an email to a valid address through which a user can contact the company; email address probably quicker while company is young and growing].

Please note that to protect your information and the integrity of our services, we may need to verify your identity before processing your request. In some cases we may need to collect additional information to verify your identity, such as a government issued ID.

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent's identity.

### Contact for More Information

If you have additional questions about this Notice or how to exercise your rights under the CCPA, please contact us.

Phone: (443) 668-9972

Email: info@happycabbage.io

Mail: Happy Cabbage Analytics, Inc.

Attn: Data Privacy Request  
631 Folsom St. Apt. 9F  
San Francisco, CA 94107  
United States