



Qubulus Privacy Policy

Last update: March 30, 2011

1. General

At Qubulus we recognize that privacy is an important issue and that personal data should be processed in accordance with applicable legislation. The information provided in this privacy policy (the "Privacy Policy") is designed to help you, understand what information we collect, and how we handle the information once we collected it.

If you are an end-user ("End User") of the Qubulus websites ("Qubulus Websites"), we will collect your data by means of the Qubulus Websites or through other contacts between you and Qubulus.

If you are a developer ("Developer"), we will also collect your data by means of the information, tools, applications, services, products, software, websites and systems (the "Platform") which Qubulus provides, or through other contacts between you and Qubulus. Providing your personal data through these channels implies knowledge and acceptance of this Privacy Policy.

Qubulus is the provider of the Qubulus Websites, Qubulus Content and the Platform. In this respect Qubulus would like to point out that:

- a) When you, as a developer, create a user account (a "User Account") through the Qubulus Websites we will process the personal data necessary to open such a User Account. Qubulus is the controller with regard to this processing. Please note that you, and not Qubulus, determine the purposes for which you collect, use and disclose information via your User Account and that you are the controller with regard to these data;
- b) When you, as an End User, use the Qubulus Websites we will process your data necessary for your access to and the subsequent transmission of Qubulus Content and any Third Party Content. Qubulus is the controller with regard to this processing.

2. Data usage

In addition to the aforementioned purposes, we may use the collected personal data for the following purposes:

- a) The provision of access to and subsequent transmission of Qubulus Content and Third Party Content;
- b) Send you email and electronic notices containing service or promotional communications about Qubulus;
- c) Improvement and technical administration of the Qubulus Websites, Qubulus Content, the Platform and/or services.



Qubulus only processes those personal data necessary for the fulfillment of the above mentioned purposes. If you are a Developer and register for a User Account, you must provide us with the following information: username, password and email address. We may, in addition to the aforementioned data but not limited to, also collect contact information, public contact information and information regarding your application.

Your personal data will not be sold to third parties. We will only share your data with third parties when necessary to providing you Qubulus Content, Third Party Content or services.

3. Collection and use of personal data

The publication, overview and accessibility of online profiles;

As part of the services offered to you, the information you provide to us may be transferred to countries within and outside of the European Economic Area ("EEA"). More specifically your personal data may be transferred to hosting parties, email service providers, CRM providers and payment service providers in the United States, having a different level of data protection. However, if we transfer your information outside of the EEA in this way, we will take all steps reasonably necessary to ensure that your privacy rights remain protected. The purpose of the transfer is the provision of access to and subsequent transmission of mobile services.

Specifically to Developers we point out the following:

We will also process location data including but not limited to your GPS-location, which were provided by you or which we receive from GPS location service providers. These location data shall only be processed for as long as this is necessary for delivering our services or to the extent required or permitted by applicable law. Location data generated by using the free Qubulus Content and Services is the property of Qubulus, and may be shared with a third party without asking for your consent.

As mentioned above your personal data will not be sold to third parties. However, your personal data may be disclosed to third parties for the purpose of the delivery of mobile services to you.

3. Reserved rights in case of law/sold/bought business

We reserve the right to access and disclose individually identifiable information to comply with applicable laws and lawful government requests, to operate our systems properly or to protect itself or its users.

We may also disclose your personal data to third parties in the event that we sell or buy any business or assets. We reserve the right to disclose your personal data to the prospective seller or buyer of such business or assets. If Qubulus or substantially all of its assets are acquired by a third party, personal data about you as a customer will be one of the transferred assets.



4. Account and disclosure

To be able to make optimal use of the Qubulus Websites, Qubulus Content, Third Party Content and the Platform you can create a User Account. You acknowledge that the information you disclose is personal to you, and by creating a User Account you allow Qubulus to identify you.

5. Process of personal data

We will only process your personal data when appropriate. This means that we will take care that the personal data will only be processed in an accurate and adequate way. We have implemented security measures pertaining to the storage and provision of personal data, in order to, amongst others; prevent access to your personal data by any unauthorized persons.

Please note that your personal data shall only be accessed by authorized staff. These staff members are obliged to preserve the confidentiality of all the information that comes to their attention, unless disclosure is compulsory by law or necessary for the fulfillment of their task.

6. Personal data

You can request to access your personal data and you can verify/correct their accuracy. You can also request the removal of your personal data. Upon your request and verification of your identity, we will rectify, erase or block your personal data, if these data are incorrect or if you no longer want us to process these data. Due to the requested removal, it is however possible that we cannot ensure the provision of (part of) our services.

7. Cookies

The Qubulus Websites, Qubulus Content and the Platform may use cookies. A cookie is a file that the server sends to your browser and that is stored afterwards on your computer or mobile device. Cookies are only used for the performance or the facilitation of the performance of a service requested by you. Most of the cookies only function during one session or visit. You can configure your browser in such a way that it will warn you each time a cookie is installed or each time it refuses to install one. Should you refuse the installation of cookies, we cannot ensure the transmission of communications and the delivery of certain services.

8. Privacy policy change

We reserve all rights to change this Privacy Policy at any time. All changes will be in conformity with any applicable privacy law.