

Gamba Privacy Policy

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This Privacy Policy describes how and when GAMBAA ("GAMBAA" or, the "Company") collects, uses, and shares your information when you use GAMBAA, including our mobile applications and websites (the "Services"). GAMBAA receives collects your information through our mobile applications, websites, email notifications, and your other interactions with our Services. When using any of our Services you consent to the gathering, transfer, alteration, storage, disclosure and other uses of your information as described in this Privacy Policy. Irrespective of which country you reside in or supply information from, you authorize GAMBAA to use your information in the United States and any other country where GAMBAA operates.

Information Collection and Use

Creating a GAMBAA Account and Profile Information: When you create a GAMBAA account, you must provide access credentials either in the form of your username and password or by authentication using another service, such as Facebook and Google. You must also provide information that personally identifies you, including your name, cell phone number, email address, gender and date of birth ("**Registration Data**").

You may optionally provide us with additional personally identifying information, including a short bio, profile picture, other photos, phone number, credit card, videos and written material (together with Registration Data or Business Registration Data, as applicable, "**Personal Information**"). If you create your GAMBAA account by connecting through another service, we may include information from that connected account to the Personal Information we collect about you. You may update or modify your Personal Information and Contact Information at any time. Certain Personal Information must be publicly visible on your profile page on the Services ("**Profile Information**"). Other Personal Information is optionally visible on your profile page ("**Optional Profile Information**"), and you can control the Optional Profile Information you share with other users of the Services on your profile page.

Contact Information: When you create a GAMBAA account, you must also provide contact information, such as email address, phone number, or physical address ("**Contact Information**"). In addition to using your Contact Information to create your account, we may use this information to send you information about our Services, respond to your requests and facilitate your use of the Services. We may use the Contact Information (such as your phone number or email address) to help connect you with other GAMBAA users, even if that information is not publicly displayed. Some Contact Information may be required in order to use certain Services. We also use your Contact Information or Personal Information to help us efficiently operate the Service, to contact you in connection with

your transactions and other activities on the Service (including, but not limited to, confirmation emails or important news that could affect your relationship with the Company), and to forward messages to you from other Service users. These types of communications are known as "Operational Communications." In some cases, Operational Communications may also contain commercial messages, such as banner ads and special offers. By registering with the Company, you agree to receive Operational Communications.

Finding Friends and Connecting to Other Services: Our Services may include several features to help connect you to the accounts of people you already know. For example, you may upload information from your address book. GAMBA will match the information you provide with the contact information of other GAMBA users in order to provide and improve the Services, for example by making recommendations and routing GAMBA messages. You may remove address book data from GAMBA at any time through the settings in the GAMBA app or website.

Content, Following, and other Public Information: GAMBA is an e-commerce platform, but also allows social networking between users, so most of the information you provide us is information that you choose to be made public. This includes not only the content that you post and data provided with such content ("**Content**"), such as when it was posted, but also the accounts you follow, the content that you like or comment on, and other public interactions on the Services (together, "**Content Data**"). Your Profile Information is broadly and instantly disseminated. For instance, your Profile Information and public Content are immediately delivered to a wide range of users and other services that access GAMBA. When you share information or Content via the Services, you should think carefully about what you are making public.

Location Information: In addition to Personal Information and Contact Information, the Services also allow you to tell us your exact location if you choose to enable your computer or mobile device to send us location information ("**Location Information**"). We may use and store information about your location to provide features of our Services, such as tagging a video with a location, and to improve and customize the Services, for example, with Content that has been tagged near your location.

Links: We may keep track of how you interact with links across our Services ("**Links Data**"), including our email notifications, third-party services, and client applications, by redirecting clicks or through other means. We do this to help improve our Services, for example to provide relevant advertising, and to be able to share aggregate click statistics such as how many times a particular link was clicked on.

Cookies: The Services employ "cookie" technology to collect additional website usage data and to improve our Services. A cookie is a small data file that is transferred to your computer's hard disk. GAMBA may use both session cookies and persistent cookies to

better understand how you interact with our Services, to monitor aggregate usage by our users and web traffic routing on our Services, and to customize and improve our Services. Most Internet browsers automatically accept cookies. If you do not want cookies from GAMBA or other websites, you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. However, some Services may not function properly if you disable cookies.

Third-Party Services: GAMBA uses a variety of third-party services to help provide our Services. These third-party service providers may use cookies and other technologies to collect information about your use of our Services and other websites and services, including your IP address, device ID, pages viewed, and links clicked (together with Links Data, "Usage Data").

Information Sharing and Disclosure Your Consent: We may share or disclose any of your information at your direction, such as when you choose to update publicly visible aspects of your Profile Information. We may also share certain Profile Information, Usage Data or Contact Information with advertisers, vendors who use the Services to sell goods or services, or other partner companies that help us to manage and improve the Services. However, we does not share information that personally identifies you (such as your name or email address) with anyone unless you give us permission. We may provide these partners with information about the reach and effectiveness of their advertising without providing information that personally identifies you, or if we have aggregated the information so that it does not personally identify you.

Service Providers: We engage service providers to perform functions and provide services to enable the Services. We may share your Personal Information, Profile Information, Contact Information, or Usage Data with such service providers subject to confidentiality obligations consistent with this Privacy Policy, and on the condition that the third parties use your personal data only on our behalf and pursuant to our instructions.

Law and Harm: Notwithstanding anything to the contrary in this Policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect GAMBA's rights or property. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information.

Business Transfers: In the event that GAMBA is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. The promises in this Privacy Policy will apply to your information as transferred to the new entity.

Non-Private or Non-Personal Information: We may share or disclose your non-private,

aggregated or otherwise non-personal information, such as your public user Profile Information, public posts, the people you follow or that follow you, or the number of users who clicked on a particular link (even if only one did).

Modifying Your Personal Information If you are a registered user of our Services, we provide you with tools and account settings to access or modify the Profile Information you provided to us and associated with your account. You can also access, modify, or permanently delete your GAMBA account by contacting us at gamba.earth@gmail.com.

Use of Other Users' Information: The Service provides various means of communicating with other Service users through which you may have access to other users' names, email addresses and other information. By using the Service, you agree that, with respect to other users' personally identifiable information that you obtain through your use of the Service (including, without limitation, first and last name, email, photo, and links to social network accounts or user names, as applicable) you will only use such information for: (i) Service-related communications that are not unsolicited commercial messages; and (ii) any other purpose that such user expressly agrees to after adequate disclosure of such purpose. Under no circumstances can you disclose personally identifiable information about another user to any third party without our consent and/or the consent of such other user.

Our Policy Towards Children Our Services are not directed to persons under 18 under any circumstances. If you become aware that a child has provided us with personal information without your consent, please contact us. We do not knowingly collect personal information from children under 18. If we become aware that a child under 18 has provided us with personal information, we take steps to remove such information and terminate the child's account.

Changes to this Policy We may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at www.gamba.earth/Privacy. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with your account or through the Services. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

California Privacy Rights California law requires that we make certain disclosures about your data. If you are a California resident, the processing of certain personal data about you may be subject to the California Consumer Privacy Act ("**CCPA**") and other applicable California state privacy laws. Beginning January 1, 2020, the CCPA gives you certain rights with respect to the processing of your personal data (known as "personal information", as described under the CCPA). This section provides additional privacy disclosures and informs you of your additional rights as a California resident, and should be read in conjunction with this Privacy Policy.

Requests to Exercise Your Rights

A. Right to Know Request - Under the CCPA, you have a right to request information about our collection, use, and disclosure of your personal information over the prior 12 months, and ask that we provide you with the following information:

- Categories of and specific pieces of personal information we have collected about you.
- Categories of sources from which we collect personal information.
- Purposes for collecting, using, or selling personal information.
- Categories of third parties with which we share personal information.
- Categories of personal information disclosed about you for a business purpose.
- If applicable, categories of personal information sold about you and the categories of third parties to which the personal information was sold, by category or categories of personal information for each third party to which the personal information was sold

To make a verifiable request for information about the personal information we have collected about you, please email us at gamba.earth@gmail.com.

B. Right to Delete Request - You also have a right to request that we delete personal information, subject to certain exceptions. You may exercise your right to delete by emailing us at gamba.earth@gmail.com. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

- • Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

C. Household Requests - We currently do not collect household data. If all the members of a household make a Right to Know or Right to Delete request, we will respond as if the requests are individual requests.

How to Make a Request

Please note, if you do not have a GAMBA account, we will not have enough information about you to verify your requests, as we do not keep sufficient information necessary to reidentify and link you to a prior visit to the Services where data may have been collected. As such, we may be unable to verify and honor your requests. You may make a verifiable consumer request related to your personal information twice per 12-month period. You have the right not to be discriminated against for exercising any of your rights under the CCPA.

Requests Made Through Agents

You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require you to verify your identity directly with us, and we require the agent to provide proof you have authorized it to act on your behalf.

Disclosures of Personal Information for a Business Purpose

In the preceding 12 months, GAMBA has disclosed Profile Information, Contact Information, and Usage Data to the categories of recipients and listed for the purposes in the above Information Sharing and Disclosure section of this Privacy Policy.

Sale of Personal Information

Under the CCPA, a “sale” means providing to a third party personal information for valuable consideration. We do not believe that we sell or have sold your data to anyone, but due to the complexities and ambiguities in the CCPA, we are continually evaluating our third party relationships as we wait for final implementing regulations and guidance. We will update our business practices and this Privacy Policy if we determine that we have sold your personal information as we gain more clarity on what constitutes a sale under the CCPA