

# Privacy Policy

Dibs Technology, Inc., d/b/a Dibs ("we", "our", or "us") operates the website located at ondibs.com. This Privacy Policy describes how we collect, use, share and protect information obtained from members and from visitors to our website. By using our website, you have agreed and are additionally subject to the Terms of Service, which incorporates this Privacy Policy by reference. The effective date of current policy is September 23, 2016.

## Types of Information We Collect

We collect two types of information from visitors of our website: personally identifiable information and non-personally identifiable information. If you purchase our products or services, we request certain personally identifiable information from you on our order form. This includes contact information such as your name, email address, and shipping address, as well as financial information such as a credit card number and its expiration date. We use the personally identifiable information that we collect for billing purposes and to fill your orders. If we have trouble processing an order, we also will use this information to contact you. In addition, if you contact us by email through our website, we may keep a record of your contact information and correspondence. We reserve the right to use your email address and any other personally identifiable information that you provide to us to respond to you and to send you marketing materials for our own products and services. [We will not share your information with outside parties who wish to market other products and services to you.]

If at any time you would like to change your personally identifiable information, or if you no longer wish to receive materials from us or would like your personal information removed from our database, please contact us at [info@ondibs.com](mailto:info@ondibs.com). Alternatively, if you receive materials from us by email you can make use of the "opt out" provision in our communications.

Like most websites, our website may incorporate tracking technologies and cookies that allow us to track the actions of our website visitors. Tracking technologies and cookies are used to collect non-personally identifiable information, such as the name of your internet service provider, the IP address of the computer you are using, the type of browser software and operating system that you use, the date and time you access our website, the website address, if any, from which you linked directly to our website, the website address, if any, to which you travel from our website, your home page customization preferences and other similar traffic-related information. We may aggregate your information with similar data collected from other visitors to help us improve our website.

## Use and Disclosure of Your Information

Generally, we will not disclose the personally identifiable information that we collect through your use of our website to unaffiliated third parties. We reserve the right, however, to provide such information to our employees, contractors, agents, and designees to the extent necessary to enable them to perform certain services for us, including order fulfillment and website-related services such as web hosting, to improve website-related services and features, to perform maintenance services, and to distribute advertisements and other marketing materials on our behalf. We also reserve the right (unless you opt out) to share information about you among companies affiliated with us to inform you about additional products, services or promotions that may be of interest to you.

We do not sell, license, lease or otherwise disclose your personal information to any unaffiliated third party except as described below:

In order to administer or process a transaction, product or the services provided by us;

To comply with applicable laws, regulation or legal process;

To detect, prevent or otherwise address fraud or security issues;

To provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures;

To help us improve our services to you, to engage another business to help us to carry out certain internal functions such as account processing, fulfillment, member service, member satisfaction surveys or other data collection activities relevant to our business.

To protect the rights, property, safety and security of Dibs and its employees, our website visitors, and/or the public.

If we sell Dibs or any part of its assets, or Dibs enters into a joint venture with another business entity, we may disclose your personal information to our new business partners or owners who may then provide you with information about their products and services.

## **This website uses Google AdWords**

This website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site or audiences similar to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the ondibs.com website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy. You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

## **Text Messaging / SMS Policy**

When you provide us with your mobile phone number, you agree that Dibs may send you text messages (including SMS and MMS) to that phone number. You will receive a confirmation text message, and you may need to reply as instructed to complete registration. Message and data rates apply. Reply STOP to cancel, HELP for help. You agree to receive a final text message confirming your opt-out. You may opt-out at any time by texting the word STOP to shortcode 33233. You agree to receive a final text message confirming your opt-out. For help, send a text message with the keyword HELP to short code 33233. Texts may be sent through an automatic telephone dialing system. Consent is not required to purchase our goods or services. You agree to notify us of any changes to your mobile number and update your account us to reflect this change. Your carrier may prohibit or restrict certain Mobile Features and certain Mobile Features may be incompatible with your carrier or mobile device. Contact your carrier with questions regarding these issues.

Dibs will never charge you for the text messages you receive. You might see some message & data rate charges from your mobile provider, though, so be sure to check your plan.

Any information communicated to rookie for text messaging and or storage will remain in the ownership of the user, which will store securely in accordance with our security policy and the law. Dibs will take the necessary steps to secure your personal information with safeguards appropriate to the sensitivity of the information. Dibs will, at no time, rent or redistribute this information without your consent, except where legally required to do so.

It is policy, that just as a user must opt in to a text marketing list, they have the right to opt out of a particular text marketing list as well. When a user opts out of a text marketing list, they will no longer receive any texts unless they, themselves, re-subscribe.

## **Security & Information Retention**

We employ security measures to protect your personal information both online and offline from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. We encrypt many of our services using SSL. We will retain your personal information for a reasonable period or as long as the law requires.

## **Right to Update or Revise Privacy Policy**

We reserve the right to update and revise this Privacy Policy at any time. You will know if this Privacy Policy has been revised since your last visit to the website by referring to the "Effective Date of Current Policy" date at the top of this page. Your use of our website constitutes your acceptance of this Privacy Policy as amended or revised by us from time to time, and you should therefore review this Privacy Policy regularly.

## **Hyperlink Policy**

Please be aware that the Site may contain links to third party websites. Any such link is provided only as a convenience. The inclusion of any link does not imply an affiliation, sponsorship, endorsement, approval, investigation, verification or monitoring by Dibs of any information contained in any third party website. In no event shall Dibs be responsible for the information contained on that website or your use of or inability to use such website. You should also be aware that the terms and conditions of such website and the website's privacy policy may be different from those applicable to your use of the website.

## EU Compliance

Dibs complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Dibs has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit : <https://www.privacyshield.gov/>

In the context of an onward transfer, a Privacy Shield organization has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. The Privacy Shield organization shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, Dibs 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 Dibs:

By Email: [info@ondibs.com](mailto:info@ondibs.com)

By Phone: +1 646 760 3427 or +44 (0) 20 33898689

Dibs has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

Dibs is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Dibs may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.