

## Privacy Policy

Last update: 12/20/2019

Rubato, Inc. (“Rubato,” “us,” “we,” or “our”) is committed to protecting and respecting your privacy in connection with your use of our website, [www.Rubato.com](http://www.Rubato.com) (the “Website(s)”), applications (“Apps”) and other products, services and features thereof (the Website, the Apps and such other products, services and features are collectively referred to herein as the “Product” or “Products”, which may be updated from time-to-time at the sole discretion of Rubato). This privacy policy (“Privacy Policy”) and any other documents referred to herein set forth the basis on which any personal data we collect from you, or that you provide to us, in connection with the Products will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will collect, use and disclose your personal data. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <http://go.adr.org/privacyshield.html>.

### 1. DATA WE MAY COLLECT

We may collect and process the following data about you: • Personal data including, for example, your name, e-mail address, password, and in certain instances, telephone number, data about your usage of the Products and data collected by tracking technologies as further described in section 4 below that may identify you as an individual or allow online contact with you as an individual.

- For individuals who participate in a Rubato Family plan, we may collect additional personal data, for example, home address in order to verify family member status.
- If, as a primary account holder of a Rubato Family plan, you choose to invite additional family members to become subsidiary account holders, we will ask you for their name and email address. We will use this data to invite him or her to join the Products. We store this data for the sole purpose of sending invitations and confirming family member status. If your subsidiary account holder(s) would like us to delete their data, they can do so by contacting the primary account holder of their family plan to be removed.
- Rubato does not collect or process credit or debit card (“Payment Card”) data. Apple and Google collect Payment Card data with respect to in-app purchases made through the Apps, and our payment processor collects Payment Card data with respect to purchases made through the Websites. Such payment processors generally provide us with some limited data related to you, such as a unique, anonymous token that enables you to make additional purchases using the data they’ve stored, and your\_\_ card’s type, expiration date, billing address, and the last four digits of your card number.\_\_

- For individuals using the Products in connection with a Community client account as described in section 6, business data such as your company name, and company email address to the extent that you or your Community provides such data.
- Facebook profile information, such as name, email address, and Facebook ID, if you choose to log in to the Products through Facebook.
- Device information such as operating system version, device type, and system performance data.
- Data collected via tracking technologies, as fully described in section 4.
- If you choose to invite a “Buddy” to use the Products using our Buddy system, we will ask you for their name and email address. We will use this data to invite him or her to join the Products. We store this data for the sole purpose of sending invitations and tracking the success of our Buddy program. If your Buddy would like us to delete his or her data, they can do so by opting-out as described in each invitation or by contacting us at [help@Rubato.com](mailto:help@Rubato.com).
- If you choose to have your account verified to confirm your status as a student, we may allow a third party platform to access the specific personal data you provide in order to perform the verification. All the information you need to fill