

Privacy policy

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Rubbl, LLC (hereinafter, “Rubbl”, “we”, or “us”) cares about privacy and wants you to be familiar with how we collect, use, process and disclose your information. This Privacy Policy covers your access or use of our websites and applications (“Platform”), when communicating with us or other Rubbl users on any device (collectively “Services”), or when you otherwise provide us with information. Rubbl Inc. acts as the data controller for the purpose of this Privacy Policy.

- [What we collect](#)
- [How we use what we collect](#)
- [Disclosure](#)
- [Your preferences and choices](#)
- [Security](#)
- [Important information](#)
- [Changes to this privacy policy](#)
- [Contact](#)

What We Collect

We collect three categories of information - information you give us; information automatically collected from your use of the Services; and information from third party sources.

Information you give us

Account information. When you register for an account with us, we require certain identifying information such as your name and email address.

Profile information. We may also ask you to provide additional profile information to use certain features of the Rubbl Service which may include street addresses, phone numbers,

identification numbers and other relevant data. [*Certain parts of your profile will be publicly visible to others.*]

Payment information. We collect your financial information (like your bank account or payment card numbers) in connection with a potential or actual transaction, which may be stored by one or more third party payment services providers or digital payments companies that may be located inside or outside of the United States.

Authentication information. In some instances, we may ask you to provide us certain unique information, such as a password and/or answers to security questions for the purpose of verifying your account.

Communications with Rubbl and Rubbl users. When you communicate with Rubbl, whether via phone, email or chat, or use the Services to communicate with other users, we collect information about your communication and any information you choose to provide.

Information we automatically collect when you use or access our Services.

Usage data. We collect information about your interactions with the Platform, such as the pages or other content you view, your searches, bookings you have made and other actions on the Platform.

Location information. When you use certain features of the Platform, including if you opt in to use our Location Sharing feature, we may collect information about your location (e.g., IP address) or more specific location information (e.g., more precise location information from your mobile device). Keep in mind that most mobile devices allow you to control or disable the use of location services by any application on your mobile device in the device's settings menu.

Log data. We automatically collect log information when you use the Platform, even if you have not created a Rubbl account or logged in. That information includes, among other things: details about how you've used the Platform, IP address, length of stay, frequency of visits, hardware and software information, device information, device event information (e.g., crashes, browser type) and the page you've viewed or engaged with before [or after] you've used the Platform.

Transaction information. We collect information related to your transactions on the Platform, including the date and time, amounts charged, equipment viewed, and other related transaction details.

Remote access. If a unit is enrolled on the Rubbl platform, the information we collect may include GPS location, use hours, battery voltage, fuel level, odometer reading, malfunction indicators, engine state (e.g., stopped/running), and VIN (if applicable). Rubbl may also have the ability to shut on/off a unit remotely.

Cookies and similar technology. We, and third party companies and individuals we engage to provide services to us, may use Cookies, web beacons, or other similar technologies (collectively “Cookies”) that are necessary to the operation of our sites, services, applications, and tools (“Platform”). This includes technologies that allow you access to our Platform that are required to identify irregular site behavior, prevent fraudulent activity, and improve security or similar functions. We may use Cookies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our Platform, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our Platform. We may use Cookies that allow us to offer you enhanced functionality when accessing or using our Platform. This may include identifying you when you sign into our sites or keeping track of your specific preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites. We may use first-party or third-party Cookies to deliver content on our Platform or on third-party websites and applications. This includes using technologies to understand the usefulness to you of content that has been delivered to you, such as whether you have clicked on an advertisement. Most browsers automatically accept Cookies, but you can modify your browser setting to decline Cookies by following the instructions provided in your browser. If you choose to decline Cookies, please note that you may not be able to sign in, customize, or use some of the interactive features of the Platform. We can change this Cookie Policy at any time. If we make material changes to the Cookie Policy, we will let you know either by posting the changed Cookie Policy on the Platform or by sending you an email. It's important that you review the changed Cookie Policy. If you do not wish to agree to the changed Cookie Policy, then we cannot continue to provide our Services to you, and your only option is to stop accessing our Services.

Information we collect from third party sources.

If you choose to log in to our Services through social media sites (e.g., Facebook or Google), the third-party service may send us information such as your registration and profile information from that service. The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your Rubbl account and authorizing Rubbl to have access to this information, you agree that Rubbl may collect, store, and use this information in accordance with this Privacy Policy. We are not responsible for how those third parties use and share your information. Please refer to those third parties' privacy policies to understand how they use and share your information.

How we use what we collect

We use, store and process your information to provide and improve our Services and ensure a secure, safe and trusted experience. For example, we may use your information to:

Provide and improve our Services

- enable you to access and use the Rubbl Services
- provide customer support
- send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you and contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our Terms of Service
- enable the processing of transactions and send notices about your transactions
- improve the Services, including by personalizing or customizing your user experience
- measure the performance of the Services and improve our content and layout
- enable you to communicate with other Rubbl users, including by sending them messages or other information during the booking process
- if you provide us or our service providers any information relating to other people in connection with the Services, we may use and store this information to facilitate your referral invitations; send your requests for reviews, for fraud

detection and prevention and for any purpose you authorize at the time of collection

Ensure a secure, safe and trusted experience

- verify your identity or authenticate information provided by you, including during account creation and password reset processes
- resolve disputes, collect fees, and troubleshoot problems
- detect, prevent, and/or remediate fraud, abuse, security incidents or other potentially harmful, prohibited or illegal activities
- detect, prevent or remediate violations of and enforce our Terms and Policies
- manage and protect our information technology infrastructure
- conducting investigations and risk assessments
- conduct checks against databases and information sources (such as but not limited to public government databases)

In this regard, we may do any or all of the foregoing with or without further notifying you as permitted by applicable law;

Provide and improve our Services

- provide targeted marketing, provide service update notices, and deliver promotional offers based on your communication preferences
- perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties
- administer referral programs, rewards, surveys, contests, or other promotional activities or sponsored events

We retain your information as long as it is reasonably necessary and relevant for our operations, legal obligations or other purposes.

Disclosure

You may direct us to share your information or consent to it as described at the time of sharing, such as when you authorize us to send to a third party marketing partner.

Service providers

We may share Information with vendors and service providers who are engaged by, or working with, us in connection with the processing of payments, operation of our Services and customer support functions and who need access to such information to carry out their work for us. In some cases, the service provider may be directly collecting the information from you on our behalf. These service providers may be located inside or outside your country of residence, including outside the United States. For owners who choose to use our photography program, your contact information will be shared with the photographer assigned to shoot your vehicle. These providers have limited access to your information to perform these tasks on our behalf and are contractually obligated to use it consistent with this Privacy Policy.

Aggregated data

Rubbl may compile aggregate information about the use of the Services. In other words, information about how you use a service may be collected and combined with information about how others use the same service. Aggregate data helps us understand trends and our users' needs so that we can better consider new features or otherwise tailor our Services. Rubbl may also share aggregate demographic information with advertisers and partners. This policy in no way restricts or limits our collection and use of aggregate information that does not identify any individual.

Responding to Legal Requests, Preventing Harm, and Protecting our Rights

We may disclose your information to courts, law enforcement, governmental or tax authorities, or authorized third parties. We will make such disclosure to the extent we are

required or permitted to do so by applicable law or if such disclosure is reasonably necessary to comply with our legal obligations or legal process and to respond to claims asserted against us. We may also disclose your information in response to valid legal requests relating to criminal investigations or alleged or suspected illegal activity or any other activity that may expose Rubbl, you, or any other user to legal liability or to protect the rights, property, or personal safety of Rubbl, our employees, our users, or members of the public.

Your preferences and choices

Communication preferences

You can control the methods by which we may contact you about your account, your booking and listing activities, promotions, and announcements in the Notifications section within your Rubbl account.

Correct and update

You can review, correct, update, and edit certain information that has been previously provided to us by you at any time by logging in to your account and reviewing your account settings and profile. You can also access or request a correction of your information by contacting us at support@rubbl.com. For your protection, we may need to verify your identity before implementing your request.

Account closure

If you wish to close your account and request deletion of your information, please send an email to support@rubbl.com.

Please note that we may be unable to delete information to comply with applicable laws, detect or prevent fraud, collect any fees owed, resolve disputes, assist with or process claims, troubleshoot problems, assist with any investigation, comply with audits and investigation, to enforce our Terms of Service and Policies and take other actions reasonably necessary, permitted, or required by applicable law. There may also be residual information that will remain within our databases and other records, which will not be removed.

Access

You may request a copy of your information provided to us by visiting your account page [on the web]. We will send you with a copy of the personal information to the email address provided in your account as soon reasonably practicable. We may request proof of identification or re-authentication to verify your access request.

Security

We have endeavored to put into place reasonable security measures in an effort to protect information against unauthorized access, destruction, or alteration while it is under our control. However, no method of transmission over the Internet, and no method of storing information, can be 100% secure. So, we cannot guarantee the absolute security of your transmissions to us and of your information that we store.

State Specific Rights

California Privacy Rights

The following are rights specific to users who are residents of the State of California only (we may require proof of California residency in advance or in response to a request invoking CCPA rights):

California Privacy Protection Act (CCPA). Consumers (as defined in the CCPA) that use the Platform and who are residents of the state of California (CA) have the right to, no more than twice in any 12 month period, for activities on the Platform in the 12 months prior to such consumer's request:

- o Know what personal information is being collected by Rubbl about them, for what business purpose, and from what types of sources;
- o Access the personal information that has been collected by Rubbl about them;
- o Know if this personal information that is being collected by Rubbl about them is being disclosed to a third-party or sold to a third-party, and if being sold, whom it's being sold to *;

- o Opt-out of the sales of any personal information that is being collected by Rubbl about them *; and
- o Request any personal information about you that has been collected by Rubbl already be deleted.

* NOTE: Rubbl does not sell any personal information that it collects. For full details on how we may share information on you, please see our How we share your information section of this Notice.

To request one or more of these CCPA rights regarding the Platform, please do one of the following:

- o Send a formal written request to support@rubbl.com with your name, email address, and if applicable, your mobile phone number (if you receive text messages from Rubbl) and which CCPA right(s) you wish to invoke.
- o As an alternate method, you can also contact us via our toll-free phone number at +1 (866) 455-8531 and leave a voice mail with your name, email address, and if applicable, your mobile phone number (if you receive text messages from Rubbl) and which CCPA right(s) you wish to invoke.
- o Mail us a request including a photo or scanned copy of your state ID or driver's license, your name, email address, and if applicable, your mobile phone number (if you receive text messages from Rubbl) and which CCPA right(s) you wish to invoke to the following address:
 - Rubbl 444 S Cedros Ave. Suite 185 Solana Beach, CA 92075

Shine the Light. California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from Rubbl once a year, free of charge, information about the personally identifiable information (if any) we disclosed to third-parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to:

Rubbl 444 S Cedros Ave. Suite 185 Solana Beach, CA 92075

Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response. Also note that under California law, businesses are only required to respond to a shopper's request once during any calendar year.

Other State Privacy Rights

Nevada Residents. If you are a resident in the state of Nevada, please note that we do not sell your information to third-parties for any monetary compensation. Thus, any request from a resident of Nevada directing us not to sell the information we collect from you is inapplicable, and we will not respond to such requests. If you have any questions about our third-party disclosure practices, please contact us at support@rubbl.com.

Non-U.S. Residents

Residents of other countries outside the U.S., such as the European Union, may have other rights. While you may be able to setup an account as a user outside the U.S., we make no assurances or representations of any kind that the Platform is suitable for use in the country in which you reside.

By accessing the Platform, establishing an account, using the Services or making a payment, you consent to the processing of your personal information as provided in this Notice. You may withdraw that consent by contacting us at support@rubbl.com. You are required to provide certain personal information in order to open and maintain an account. Your failure to provide such information may preclude you from establishing an account or may subject your account to termination.

If at any point you believe the personal information we process about you is incorrect, you may access your account and modify it there, or otherwise request to see the information and to have it corrected or deleted by contacting us at support@rubbl.com. If you wish to object to or raise a complaint on how we have handled your personal information, you may contact our Data Protection Officer who will investigate the matter. You may also be able to have your personal information transferred by contacting us at support@rubbl.com.

If you are not satisfied with our response or believe we are processing your personal information not in accordance with law, you may complain to the data protection authority in your jurisdiction.

General Data Protection Regulation (GDPR)

If you are a resident of the European Union (EU), believe your information has been stored on the Platform, and wish to exercise one or more of your GDPR rights regarding your personal data on the Platform (which may include Personal Data Access, Rectification, or Erasure), please do one of the following:

- Complete our online GDPR identity verification form directly (you will be required to upload a photo or scan of a valid photo ID (e.g., driving license, national identity card, or passport), which we will only use to verify your eligibility. You must complete this form accurately and completely in order to have your request processed. Once your eligibility is verified, Rubbl will use commercially reasonable efforts to complete all applicable portions of the request; or
- Mail us a request including a photo or scanned copy of your valid photo ID, your name, email address, and if applicable, your mobile phone number (if you receive text messages from Rubbl) and which GDPR right(s) you wish to invoke to the following address:

• The data controller for personal information collected pursuant to this Platform is Rubbl Inc.

Our Data Protection Officer (DPO) is Mike Smith and you may contact him at support@rubbl.com.

Important information

This section describes some additional important privacy information related to your use of our Services.

Change of ownership

If we merge with or are acquired by another company, we may share information with them in accordance with our privacy standards and applicable law.

Sensitive information

We ask that you not send us, and you not disclose, any sensitive information unless specifically requested (e.g., Social Security numbers, social insurance numbers, passports, information related to racial or ethnic origin, political opinions, religion, trade union membership or other beliefs, health, biometrics, or genetic characteristics) and subject to applicable law on or through the Services or otherwise to us.

Children's privacy

Our websites are general audience websites, and our Services are not intended for anyone under the age of 21. We do not knowingly collect information from users under the age of 21. If a child has already provided us with information, his or her parent or guardian may contact us for the purpose of deleting this information or closing an account.

Third party privacy practices

This Privacy Policy addresses only the use and disclosure of information collected by Rubbl. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. If you disclose your information to others, or if you are directed to a third party website, their privacy notices and practices will apply.

This Privacy Policy addresses only the use and disclosure of information collected by Rubbl. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. If you disclose your information to others, or if you are directed to a third party website, their privacy notices and practices will apply.

Signed in

If you sign in to our Platform using an email address and password, your session will expire after 30 days unless you log out but if you sign in through a social network login such as Facebook or Google, you will stay logged on/signed in until you explicitly sign out of your account or clear your Cookies. If you are using a public or shared computer you should sign out and/or clear your Cookies when you are done using our Platform in order to protect your account and your information. If you do not sign out, you or any other user of the computer/browser you signed in on will be able to view and access your account, including your social media accounts.

Changes to this privacy policy

We may change this Privacy Policy. Please take a look at the “Last revised” legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy. If you don't agree to these changes, you can contact us to close your account and you will only be bound by the prior version of the Privacy Policy.

Contact

Rubbl welcomes your questions and comments about privacy, and what we do. Please feel free to contact us at support@rubbl.com.