



iKeepSafe Product Profile
Gabb Wireless Inc.
MyGabb Parent App with
Gabb Watch 2
Gabb Phone
Gabb Phone Plus

Introduction

The iKeepSafe Privacy Program is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and by families, schools and which may collect, store, process or otherwise handle children's or student's data.

This *iKeepProfile* is intended to assist you in determining whether, Gabb Wireless Inc. specifically the **MyGabb Parent App and Gabb Watch 2, Gabb Phone and Gabb Phone Plus**, complies with COPPA. It indicates that **Gabb Wireless** has been assessed for alignment with the iKeepSafe COPPA Privacy Program Guidelines.

www.gabb.com

Product Overview

Gabb sells smartwatches and smartphones to kids.

Parents can track their kid's location using the MyGabb Parent App, available for both iOS and Android.

Agreement

A. Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501- 6506)

1. Gabb Wireless Inc. makes available clearly written policies explaining what data it collects from users, how such data is used, stored and to whom it may be disclosed.
2. Gabb Wireless Inc. makes a copy of the privacy policy available prior to completion of the sale, download or installation of the product.
3. Gabb Wireless Inc. provides a description of the types of personal information collected; an opportunity to review the child's personal information and/or have the information deleted; and the opportunity to prevent further use or online collection of a child's personal information.
4. Gabb Wireless Inc. collects limited data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a valid business function that meets the strict definition of support for internal operations.
5. Gabb Wireless Inc. does not, will not condition a child's participation in an activity on the child disclosing more personal information than is reasonably necessary to participate in such activity.
6. Gabb Wireless Inc. maintains reasonable procedures to protect the confidentiality, security, and integrity of personal information collected. It takes reasonable steps to release children's personal information only to service providers and third parties who can maintain the confidentiality, security and integrity of such information, and who provide assurances that they will maintain the information in such a manner.
7. Gabb Wireless Inc. will retain personal information collected online from a child only as long as is reasonably necessary to fulfill the purpose for which the information was collected. It will delete such information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion.
8. Gabb Wireless Inc. will conduct annual training related to data privacy and security, including COPPA requirements, for all employees responsible in whole or in part for design, production, development, operations and marketing of their products. Such training will include all employees who are directly or peripherally involved in collection, use, storage, disclosure or any other handling of data.
9. Gabb Wireless Inc. will not make material changes to its privacy and security policies, including adding practices around new or additional data collection, or changes that may lessen the previously noted

Security Protocols

The following is a general overview of data security protocols of Gabb Wireless Inc.:

Data in Transit:

All data is transmitted over HTTPS.

Data at Rest:

For Gabb Cloud, we use storj.io. Every file and its metadata are encrypted with AES-256 encryption by default and the system distributes erasure-coded pieces of the file to a diverse set of Storage Nodes.

Data Center Security:

Gabb Wireless Inc. utilizes data centers operated by AWS. Data backups are stored on AWS S3 with secure bucket and AWS encryption. AWS comes with a public and private key authentication to access the cloud server running the platform and storing the data and the data backups.

[https://aws.amazon.comCloud Computing Services - Amazon Web Services \(AWS\)/compliance/iso-27001-faqs/](https://aws.amazon.comCloud%20Computing%20Services%20-%20Amazon%20Web%20Services%20(AWS)/compliance/iso-27001-faqs/)

<https://aws.amazon.com/compliance/data-privacy-faq/>

Personnel:

Training: Gabb Wireless Inc. conducts privacy and security training for all employees.

Access: Access to children's data is limited to those employees who need access to perform job responsibilities. All employees with access to Children's PII have undergone background checks.

Data Deletion

Gabb Wireless App and Watches/Phones store your Personal Information for as long as it is necessary to provide their Devices and Services to you. Personal Information associated with the account will be kept until the account is deleted. They perform an annual audit of Personal Information and will remove all Child Personal Information for Child Accounts that are inactive and/or have not been deactivated.

Access to Audit

Once per year, Gabb Wireless Inc. will provide parents with:



audit rights to their child's data



access to the results of Gabb Wireless Inc. or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a child's records, Gabb Wireless Inc. will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

Notification shall identify:

- a. the date and nature of the unauthorized use or disclosure;
- b. the Private Data used or disclosed;
- c. general description of what occurred, including who made the unauthorized use or received the unauthorized disclosure;
- d. what Gabb Wireless Inc. has done or shall do to mitigate any effect of the unauthorized use or disclosure;
- e. advice to the impacted user on how they can best protect themselves.
- f. what corrective action Gabb Wireless Inc. has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at Gabb Wireless Inc. the user can contact. Gabb Wireless Inc. will keep the user fully informed until the incident is resolved.

Gabb Wireless Inc. will notify impacted user (s) within 72 hours upon the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of child's information.

Data Review Process

Gabb Wireless Inc. provides users direct access to the personally identifiable information that they provide to Gabb Wireless Inc. through product functionality.

Registered Users may access or modify their personal information provided to Gabb Wireless Inc. which is associated with the user account at any time. Users can login to MyGabb App account and visit their account settings page or email us at support@gabb.com to exercise their rights at any time.

If the user has registered for a Child Account on the MyGabb App, the user may view, edit, or delete any of your profile information or your preferences at any time by logging into the MyGabb App account and accessing the account settings page. The user can also perform a System Reset locally on the Child's Gabb's Device or through the MyGabb App Settings to wipe the Child's Gabb's Device to factory settings, removing all Personal Information.

General inquiries related to privacy may be directed to:

Email: support@gabb.com

Phone: 385-235-6646

Mailing Address:

Gabb Wireless Inc. Gabb Wireless, Inc.
4101 N. Thanksgiving Way, Suite 300
Lehi UT 84043, United States

Research

Gabb Wireless Inc. stated; We use none of the customer data for research or statistical purposes at this time. If data is used for behavioral or product improvements the data is aggregated and cannot be identified to any particular individual.

Gabb Wireless Inc. may also analyze information that does not contain "Personal Information" (or contains "Personal Information" in anonymous or aggregated form) for trends and statistics, such as through the use of Google Analytics or other similar analytics services.

Gabb Wireless Inc. does not use end user data in any non-production environments including testing, development and training. Gabb Wireless Inc. does not use end user data for production improvement or research unless the data has been de-identified. Gabb Wireless Inc. will only access non-aggregated personal information for troubleshooting purposes with direct consent and permission from the parent or

Third Parties

Gabb Wireless Inc. does not sell, trade, lease or loan the personal information they collect or maintain, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

Gabb Wireless Inc. contracts with other third-party companies to perform business functions or services on their behalf and may share PII with such third parties as required to perform their functions. Gabb Wireless Inc. has agreements in place with all third parties with access to child personal information to ensure they only use the information for purposes necessary to deliver the authorized service and to ensure they maintain the confidentiality and security of the information. The agreements align with Gabb Wireless Inc.' data privacy and security policies and expectations.

Third Party	Purpose	Information Shared
Verizon	They're our network provider.	IMEI, ICCID, phone logs, text logs.
Telispire	They're our wireless reseller.	Parent name, address, email address, phone number, account username, account password, payment information, phone logs, text logs, IMEI, ICCID.
Smartcom	They're our MyGabb Parent App Provider.	Parent account username and account password. Child first name (required). Child last name, birth date, gender, and profile picture (not required). Child location. IMEI.
ZTE	They're our Gabb Phone and Gabb Watch 2 manufacturer.	IMEI, ICCID.
Samsung	They're our Gabb Phone Plus manufacturer.	IMEI, ICCID.

Tuned Global	They're our Gabb Music App Provider and music streaming service.	Unique Child ID, music streaming behavior.
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Product Data List

Data Collection by Gabb Wireless Inc.:

Child's First and Last Name

Child's Date of Birth

Child's Gender

Child's Contact names and phone numbers

Internet and network information such as wifi SSIDs and IP addresses

Geolocation data such as geographic location indicators from mobile devices

Audio/visual information such as photos and videos

Geolocation data such as geographic location indicators from mobile devices

Audio/visual information such as photos and videos

Customizable presets, including text message, voice messaging, emojis, daily planner, step counter goals, assigned tasks, and rewards

App-specific information including audio recordings, calendar entries, notes, and music preferences

Inferences drawn from account relationships between the device user and the parent account

Subscription information such the Apps approved and/or installed, Services subscribed to, usage statistics, and service dates

Recordings of calls and text conversations with support staff

Feedback such as ratings, reviews, recommendations provided by the user through Apps

Parent's First and Last Name

Parent Physical Address

Parent Email Address

Parent Password

Accuracy Statement

Gabb Wireless Inc. hereby confirms the accuracy and truthfulness of all information contained in the Gabb Wireless Inc. Product profile, and has authorized iKeepSafe to make the profile available to any interested third parties.

Signed and agreed:



(Signature)

Colin Cole
VP of Product

Gabb Wireless, Inc.
4101 N. Thanksgiving Way, Suite 300
Lehi UT 84043, United States

Tel: 385-235-6646

05/16/2023

Gabb Wireless Inc. has been reviewed and found in alignment with iKeepSafe's COPPA Privacy Program Guidelines as indicated by this product profile. Gabb Wireless Inc. has been awarded the iKeepSafe COPPA Privacy Program badge.

DocuSigned by:

Amber Lindsay

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(Signature)

5/17/2023

Amber Lindsay
President & CEO
iKeepSafe

05/16/2023

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