

# Privacy Policy

BY USING OUR SERVICES, INCLUDING OUR WEBSITES AND APPLICATIONS, YOU ARE AGREEING TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY. YOU ARE ENCOURAGED TO READ THIS PRIVACY POLICY IN ITS ENTIRETY.

AlertCom USA ("Company," "we," "us," "our") has developed this Privacy Policy to outline how we collect, process and disclose information that we obtain when you access or use our services, including our websites and applications (our "Services"), including information about you. You should use this Privacy Policy to assess how you use our Services, the information you provide to us, and the choices you have to manage the information we collect from you in connection with your use of our Services.

By using and accessing our Services, you agree to be bound by this Privacy Policy. Accordingly, you should review this Privacy Policy frequently to remain familiar with it and any changes we may make to it from time to time. You should immediately cease using our Services if you do not agree to this Privacy related to our Services, as applicable. Should you have any questions regarding this Privacy Policy, please contact us via our Contact page.

## **IMPORTANT INFORMATION SUMMARY**

For your convenience, we have summarized the important aspects of our Privacy Policy below, but you should read the entire Privacy Policy to fully understand our privacy practices.

We collect both Personal Information and Non-Personal Information from you in connection with your use of our Services. When you choose to share your Personal Information with us, we only use such information, to communicate our responses to any queries or requests made by you.

We may share your Personal Information with third parties in a number of ways and for a number of reasons, including facilitating the provision of our Services to you, for our own uses and for this use by third parties. You can review our rights under this Privacy Policy to share your information in the Section below titled "How We Share Your Information" below.

You may review, modify and update your Personal Information by contacting us using our Contact page.

## **1. INFORMATION WE COLLECT**

When you access or use our Services, we may collect information regarding your interactions with our Services. Such information may include Personal and Non-Personal Information.

"Personal Information" means information, such as your first and last name, email address, physical address, that is able to personally identify you.

"Non-Personal Information" means information that is not capable of personally identifying you.

"Service Use Based Information" means information that we collect about your use of the Services, including:

"Device Information": The type of device you are using to access our Services, as well as information regarding that device's unique identifiers (whether computer or mobile), the device's hardware model, operating system, device type, IP address, and information about how any of our Services were downloaded to your device.

"Geolocation Information": Your location when you use our Services, when such information is available. Additionally, we may be required to collect information about your location to provide certain features offered by our Services. We will collect such information only with your consent. Should you choose not to provide the consent to collect such information, certain features of our Services may not be available to you.

"Log Data": Your device activity while using our Services, the times and duration of your use of our Services, the types of queries you submit through our Services, the referring URL from which you accessed our Services, the browser you used to access our Services, and the language used to access our Services.

"Cookies, Web Beacons, & Other Tracking Technologies": To enable our collection of information, we often use web beacons, unique identifiers, Flash

Cookies, web server log information, or other technologies. We may also collect information from and about you on behalf of third parties, who may use that information for targeting ads to you, optimizing their services and products, and general reporting. For more information on cookies, web beacons and other technologies, please read Section 6 of this Privacy Policy.

"Information Provided Directly By You": We may collect Personal Information that you choose to share with us while communicating with us through the feedback form or any other mode of communication. Such information may include but is not limited to your name and email address. Please note that this information is only used by us to respond to any queries and request made by you.

## **2. HOW WE USE YOUR INFORMATION**

Your information held by us may be used for business and commercial purposes. We may use your information to: (i) make the features on our Services available to you; (ii) monitor the use of our Services and make required modifications and/or enhancements; (iii) analyze the use of our Services (including the total number of users using our Services and generate related reports to support the research); (iv) ensure smooth and error-free functioning of our Services; (v) respond to any inquiries or support requests made by you; (vi) communicate with you about promotional offers through push notifications; (vii) ensure compliance with our contractual, legal and regulatory obligations; (viii) enforce our rights; and (ix) prevent fraud and abuse against our Services (collectively, the "Legitimate Purpose(s)").

## **3. HOW WE SHARE YOUR INFORMATION**

We will not sell your information to anyone.

We may share your information, including your Personal Information, with our commercial partners, who assist us in providing the features offered by our Services, including our services, advertising, and content partners (collectively, "Commercial Partners") or allow those Commercial Partners to gather information directly from you.

Your Personal Information may also be shared with third parties in other circumstances, including without limitation, as follows:

**Commercial Partners:** We may, with your consent, provide your Personal Information to our Commercial Partners who work with us to provide any portion of our Services, or to provide additional services unrelated to our Services. Should you choose not to permit the sharing of your information with our Commercial partners, some features of our Services may not be made available to you.

**For Legal Requirements:** Where it is necessary for us to address suspected fraud or illegal activities, to prevent or take action in connection with potential threats to the physical safety of any person, or to comply with any applicable law, we reserve the right to share your Personal Information, regardless of whether there is a court order, warrant or subpoena.

**Sharing with our Affiliates:** We may share your Personal Information may with our Affiliates. Our Affiliates may use and distribute your information in accordance with the terms of this Privacy Policy. For purposes hereof, "Affiliates" means any entity controlled by, controlling, or under common control with Company.

**For Transactional Requirements:** If the Company undergoes a change in control, reorganization or liquidation, or a sale of all or substantially all of our assets or a portion of our business or Services to which your information relates, we may transfer such information to our successor or buyer, subject to the terms of this Privacy Policy.

We disclaim and shall have no liability or obligation in connection with any third-party actions or omissions concerning your information, regardless of whether or not such access is a result of our sharing and disclosure of your information pursuant to this Privacy Policy. If you have any issues concerning a third party's use of your information, please contact such third party. Any transfer of your information will comply with applicable law in all cases. For more information on third-party use of your information, please see Third-Party Practices herein. Any Non-Personal Information we collect may be shared by us publicly and with others.

#### **4. INFORMATION RETENTION**

Unless otherwise required by law, we will retain your Personal Information only for such period as may be necessary to fulfil the purposes for which such

information has been collected, enforce our agreements and resolve disputes, if any.

## **5. SECURITY OF INFORMATION**

We place appropriate restrictions on access to personal information stored by us and employ reasonable technical, physical and operational security measures intended to protect your personal information from alteration, loss, unauthorized use or misuse, or destruction.

To safeguard any information in transit, we use the SSL (Secure Socket Layer) technology to ensure encryption of all information transmissions from and to our servers.

Please note that no transmission of information over the internet is 100% secure. While we review our measures periodically and ensure that we implement safeguards and controls to store and transfer your information securely, we cannot warrant the security of any information transmitted from or to our servers.

## **6. COOKIES AND WEB BEACONS**

In connection with your use of our Services, we may send your computer or mobile device a cookie that uniquely identifies your browser. A "cookie" is a small file containing your preferences that is sent to your browser and sent back by your browser each time your browser accesses our servers. Our use of cookies is primarily focused on improving the quality of our Services and your use of those Services.

We use session cookies (a type of cookie that is stored temporarily and gets deleted when a browser is closed) and persistent cookies (a type of cookie that is stored on the device till it expires or till the user deletes it) to deliver our Services in your language of choice, to filter results and fulfil other preferences you may have, and to analyze how our users interact with our Services by tracking user trends and patterns of how people search. Many browsers are set up to accept cookies unless the user changes the settings for cookies, and you can control these settings within your browser preferences or refuse cookies altogether.

## **7. DO NOT TRACK**

Some browsers may allow you to enable a do-not-track feature that notifies the websites you visit that you do not want your online activities to be tracked. At present, our Services do not recognize or respond to 'do-not-track' signals from browsers.

## **8. THIRD-PARTY PRACTICES**

We are not responsible for the information collection and processing practices of any search provider, including Yahoo and such practices are not governed by this privacy policy.

Our Commercial Partners may request or require you to provide information, including Personal Information, to them or to download certain software in connection with the provision of our Services. We have no responsibility for the privacy practices of our Commercial Partners or the contents of any software downloaded from such Commercial Partners. To the extent any portion of our Services may also link to third-party websites and offerings over which we exercise no control, Company shall have no responsibility for the privacy practices or the content of such third-party websites and offerings, including their information collection, storage, usage and sharing practices. Please contact such third parties in connection with any issues you may have with respect to those third-party websites and offerings.

If you believe that any party who claims association with Company, including our Commercial Partners, is improperly collecting or using information about you, you should contact them directly. Applicable law obligates our Commercial Partners to protect the privacy of certain types of data. We are not responsible for their actions or omissions in any way, including with respect to any information they receive directly or indirectly from us. While we assume no responsibility with respect to a third party's practices, you may notify us using our Contact page if you believe a third party is collecting or using information about you and such information was sourced from us. We are under no obligation to respond to or pursue any action in connection with such correspondence.

## **9. CALIFORNIA PRIVACY RIGHTS**

Section 1798.83 of the California Civil Code (the "CCPA") grants users that reside in California certain additional rights. Those rights are described below alongside instructions about how to assert them.

Opt-Out	You have the right to opt-out from the sale of your Personal Information, though that may impact your ability to use the Site and/or obtain products or services from us.
Access	You have the right to request that we disclose to you (1) the categories of Personal Information we have collected about you; (2) the categories of sources from which your Personal Information is collected; (3) the Legitimate Purpose for collecting or selling your Personal Information; (4) the categories of third parties with whom we share your Personal Information; and (5) the specific pieces of Personal Information we have collected about you. If we sell your Personal Information, or disclose it for a Legitimate Purpose, you also have the right to request that we disclose to you (1) the categories of your Personal Information that we sold; (2) the categories of third parties to whom your Personal Information was sold; and (3) the categories of your Personal Information that we disclosed for a Legitimate Purpose.
Deletion	You have a limited right to request that we delete your Personal Information. Once we receive and confirm a verifiable request, we will delete (and direct third parties to delete) your Personal information, unless we need to maintain your Personal Information in order to: Complete the transaction for which the Personal Information was collected, provide a good or service requested by you, or reasonably

	<p>anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you</p> <p>Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity</p> <p>Debug to identify and repair errors that impair existing intended functionality</p> <p>Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law</p> <p>Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code</p> <p>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 our deletion of the Personal Information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent</p> <p>Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with our business</p> <p>Comply with a legal obligation</p> <p>Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the Personal Information.</p>
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## How to exercise your rights under California Law



To exercise your rights under the CCPA, please submit a request by contacting us using our Contact page. You must (1) describe your request in sufficient detail, and (2) include information that allows us to confirm your identity. You may only make one request per 12-month period. Only you or a person registered with the California Secretary of State to act on your behalf may make a request under this Supplemental Notice. We will use your request only to verify your identity and respond to you (if possible). We cannot respond to your request if we are not able to verify your identity. You will not need to create an account in order to assert your rights. We endeavor to answer all requests within 45 days. In some cases, a response may be delayed by as much as 90 days, though in that case we will inform you of the reason.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not (1) charge you a different price for goods or services; (2) provide you a lower quality of good or services than are generally available to our consumers; (3) refuse you discounts or benefits that are generally available to our consumers; or (3) deny you goods or services.

## **10. MINORS**

We at all times comply with the Children's Online Privacy Protection Act (COPPA). Please click [here](#) for more information about COPPA and children's privacy. Children under the age of 18 are prohibited from accessing the Services and may not give us any Personal Information or participate in any aspect of our Services. Our Services are not directed to children under the age of 18. Unless required by law, we will not knowingly collect, maintain, or disclose any Personal Information from children under the age of 18. We do not intentionally gather Personal Information about visitors or end-users who are under the age of 18. Please contact us using our Contact page if you believe that we have collected Personal Information about a visitor or end user who is under the age of 18, and such account and/or Personal Information will be deleted.

## **11. EU USER RIGHTS**

All European Union Citizens have certain rights regarding their Personal Information. If you are a citizen of the EU, you have the following rights to control the processing of your information:

**Right to Access:** If we process your Personal Information, you have the right to request us to provide you with access to the Personal Information we process about you.

**Right to Rectification:** You have the right to request us to rectify any inaccurate Personal Information concerning you, including completion of Personal Information which you believe is incomplete.

**Right to Data Portability:** You have the right to receive the Personal Information about you in a structured, commonly used, and machine-readable format. You have the right to request us to transmit this Personal Information to a third party, where such transmission is technically possible.

**Right to be Forgotten:** You have the right to request for erasure of your Personal Information. We will ensure that we delete your information held by us if: (a) your Personal Information is no longer required for the reasons for which it was collected or otherwise processed; (b) we have unlawfully processed your Personal Information; (c) we are required to erase your Personal Information to comply with our legal obligations; or (d) we have no legitimate grounds for processing your Personal Information when you object to the processing of your Personal Information or withdraw your consent.

**Right to Object:** You have the right to object to the processing of your Personal Information if such objection is based on processing of your information and profiling for (a) direct marketing purposes; (b) performing a task executed in public interest or in exercising the official authority vested in us; or (c) the purposes of the legitimate interests sought after by us or by a third party, excepting cases where your interests or fundamental rights, which require Personal Information protection, disregard such interests. We shall immediately stop processing your information, unless we have legitimate grounds to process your Personal Information or where such processing is crucial to establish, exercise or defend legal claim(s).

**Right to Restriction:** You have the right to restrict us from processing your Personal Information in the following circumstances: (a) for such period pending verification of the accuracy of your Personal Information, where you contest the accuracy of your Personal Information; (b) the processing of your information is unlawful, and instead of erasure of the Personal Information, you request us to restrict the processing of your information; (c) we are no

longer required to process your information; however, you require the information to establish, exercise or defend legal claims; or (d) for such period as is required to review the legitimacy of the grounds of your objection to our processing of your information.

**Right to Withdraw Consent:** If processing of your Personal Information is based on your consent, you may withdraw your consent at any time. Please note that this does not affect the processing of your Personal Information prior to the withdrawal of your consent.

Should you like to exercise any of your rights as described above or have any questions, please contact our Data Protection Officer by contacting us using our Contact page.

## **12. CHANGES TO THIS PRIVACY POLICY**

Any changes to this Privacy Policy will be posted here and, to the extent the changes are significant, we will provide a more prominent notice. We reserve the right to revise this Privacy Policy at any time and for any reason. Your continued use of our Services after such change has been made will be considered your acceptance of such change.

## **13. COMPLYING WITH THE LAWS OF YOUR JURISDICTION.**

Our Services may not be appropriate or available for use in certain jurisdictions and we disclaim all representations and warranties to the contrary. If you access the Services, you do so on your own initiative and at your own risk, and you are solely responsible for complying with all local laws, rules and regulations. We may limit access to our Services, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion. By using our Services and submitting any Personal Information, you consent to the transfer of Personal Information to other countries, such as the United States, which may provide a level of data security different from your country of residence. You are also consenting to the application of United States law in all matters concerning the Services.