

Privacy Policy

This Privacy Policy applies to <https://snaptrakker.com>, the SnapTrakker SnapTrakker Mobile App and to the services (hereinafter, the “Services”) running on <https://secure.snaptrakker.com> owned and operated by SnapTrakker, Inc. (“We”, “Us”, “SnapTrakker”). This Privacy Policy describes how SnapTrakker collects and uses the personal information you provide.

It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

What We Collect

We collect and use the following information to provide, improve, and protect our Services:

Account Information

We collect user information in a manner consistent with the laws of the countries in which we do business. When a user registers for any of the Services we must ask for information such as, but not limited to the user’s name, company name, email address, billing address, and/or credit card information. If you created a new account with us, you will have been asked to check a box indicating your agreement to provide this data in order to use our services. This consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this policy, please do not use our services.

Your Content

Our Services are designed to make it simple to store files, documents, photos, comments, messages, videos, audio recordings, and so on (“Your Content” or “Content”), share and collaborate with others registered to your account, and work across multiple devices. To make that possible, we store, process, and transmit Your Content as well as information related to it. This related information includes your profile information and/or your

company's profile information making it easier to collaborate and share Your Content with registered users of your account. This related information also includes things like the size of the file, the time it was created or uploaded, an indicator of the user login active when the SnapTrakker Mobile App is used to acquire content, geolocation, and usage activity. Our Services provide you with different options for sharing Your Content. If you choose to transfer Your Content or portions of Your Content to a 3rd party account for storage or viewing through the SnapTrakker MDS system, the only information transferred with Your Content is your company name and contact information, the geolocation and date/time stamp for each media item acquired with the SnapTrakker Mobile App, and the SnapTrakker access code used to authorize transfer of the content. If you're a registered user of an account owned and managed by someone else, such as a colleague, friend, or employer, you are subject to the usage and access policies established by the account owner independent of the terms and policies established by SnapTrakker. Contact the Administrator of accounts you've registered to join for information regarding their usage and access policies.

Usage/Device information

As is true of most websites, we gather certain information automatically. This information may include information from and about the devices you use to access the Services. This includes things like IP addresses, the type of browser and device you use, Internet service provider (ISP), the web page you visited before coming to our sites, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, clickstream data, and identifiers associated with your devices. Your mobile devices (depending on their settings) may also transmit location information to the Services you are logged into while the SnapTrakker Mobile App is in use. The system administrator and Management Console operators for each account you are registered to can also access identifiers associated with your device allowing, among other things, the ability to block a device from accessing the account if it is lost or stolen.

SnapTrakker Administrators

If you were invited by a third party to join their SnapTrakker account, the administrator of that account has the ability to access and control your use of their SnapTrakker account. Please refer to that organization's internal policies if you have questions about how they are implementing SnapTrakker MDS. Members of the organization that invited you may be able to view your name, email address, profile picture, IP address, geolocation when logged into the account, and identifiers associated with devices you've registered with that account.

We use collected information for the following general purposes: products and services provision, billing, identification and authentication, services improvement, contact, and research. The information we collect is used to improve the content and quality of the Services. User information is not shared with or sold to other organizations for commercial purposes, except to provide products or services the user has requested, when the user has given us permission to share such information. This policy is not intended to place any limits on what we do with metadata that is aggregated and/or de-identified so it is no longer associated with an identifiable user.

Service Providers

We may share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us. These services may include, but are not limited to:

- Fulfilling orders and delivering packages
- Payment processing
- Providing customer service
- Sending marketing communications
- Fulfilling subscription services
- Conducting research and analysis
- Providing cloud computing infrastructure

A list of these third parties, along with a way to subscribe to updates, is available at <https://secure.snaptrakker.com/subprocessors/>.

Disclosure

In certain situations, SnapTrakker may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

We do not use your personal data for the purposes of automated decision-making. However, we may do so in order to fulfill obligations imposed by law, in which case we will inform you of any such processing and provide you with an opportunity to object.

In the event of a change in ownership, or a direct merger or acquisition with another entity, SnapTrakker reserves the right to transfer all of our user information to a separate entity. In this event, we will notify our users when user information is transferred and of any resulting changes in the privacy policy they may be subjected to.

Tracking Technologies

SnapTrakker and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to the user's browser from a web site's computers and stored on the user's computer hard drive.

Our Services use the following types of cookies for the purposes set out below:

Essential Cookies

These cookies are essential to provide you with services available through our Services and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Services. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

Functionality Cookies

These cookies allow our Services to remember choices you make when you use the Services, such as remembering your login details and remembering the changes you make to other parts of the Services. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit the Services.

Analytics and Performance Cookies

These cookies are used to collect information about traffic to our Services and how users use our Services. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Services, the websites that referred them to our Services, the pages they visited on our Services, what time of day they visited our Services, whether they have visited our Services before, and other similar information.

We use this information to help operate Services more efficiently, to gather broad demographic information and to monitor the level of activity on the Services.

Access

Upon request SnapTrakker will provide you with information about whether we hold any of your personal information. It's important to keep your personal information current. If you are the owner of an account, you may access or correct your personal information from your account's SnapTrakker Management Console. If you want to delete your personal

information from your account, which may require closing the account, you can do so by contacting us at: support@snaptrakker.com. We will respond to your request within a reasonable timeframe. If you are registered to an account owned by someone else, please contact the Account Administrator of the account to request changes and deletions. If you want to verify whether SnapTrakker holds any of your personal information as a registered user of someone else's account, you can do so by contacting us at:

support@snaptrakker.com. In certain circumstances we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing a service.

Security

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. If you have any questions about the security of your personal information, you can contact us at support@snaptrakker.com.

We may retain your information for as long as your account, or an account you've been registered with, is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

If a breach of data occurs within our services, we will notify you via a notification posted within the services and via an email notification at your last listed email address within 30 business days of discovering the breach. By using our services, you acknowledge and agree that we may send you electronic notifications via email in lieu of notifications by mail. If you would still like to receive notifications by mail, you can let us know by contacting us at support@snaptrakker.com.

Client and Data Storage

We collect information under the direction of people who own a SnapTrakker MDS account subscription (our "Customers" or "Customer") and have no direct relationship with the individuals registered by our Customers into their account(s) whose personal data we also

process. If you are registered user of one of our Customer's accounts and would no longer like to be contacted by that Customer^[SA1], please contact that Customer directly.

We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Customers.

You have the right to access your personal information, however, unless you are the Customer, we have no direct relationship with the individuals whose personal data we process. An individual registered with a Customer's account who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his or her query to the Customer (the data controller). If requested to remove data we will respond within a reasonable timeframe.

Although we own the data storage, databases and all rights to the SnapTrakker Mobile App and web applications, Customers retain all rights to their Content whether acquired through the SnapTrakker Mobile App or imported into the SnapTrakker MDS system. We will never sell Customer Content to any third parties. We will never share Customer Content with any third parties unless compelled to do so as described in the Disclosures section above. We will also never contact the Customer's registered users directly except when accounts are terminated when we may extend offers to create their own SnapTrakker MDS account. We also will not utilize Customer Content in our database to compete with our Customers, market to our Customer's registered users, or advertise or contact our Customer's registered users for any other means of profit. We respect the privacy of our Customers and their registered users, and the privacy of our Customer's data. The only exception regards registered users that have been deleted from a Customer's account or registered users that have been part of an account that has been terminated. In that situation, SnapTrakker may send such users information on how to setup their own SnapTrakker MDS account.

We will retain personal data we process on behalf of our Customers for as long as needed to provide services to our Customers. SnapTrakker will retain this personal information as

necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

SnapTrakker Mobile App

When you download and use our Services, we automatically collect information on mobile device identifiers such as phone, tablet or notebook type; IMEI; service provider you use and operating system version, effectively registering the device with the SnapTrakker MDS account that provided the SnapTrakker Mobile App license. This information allows us to track application performance as well as prevent devices that have been lost or stolen from accessing the SnapTrakker MDS accounts the device has been registered to.

We use mobile analytics software to allow us to better understand the functionality of our SnapTrakker Mobile App on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the SnapTrakker Mobile App.

When you acquire content using the SnapTrakker Mobile App such as pictures, videos, audio recordings and notes, we collect information related to the content such as the time/date stamp when it was acquired, location information on where it was acquired and the name of the account's registered user logged in at the time it was acquired, and so on. This information along with the device information allows the account owner to authenticate when and where the content was acquired, which registered user acquired it, and to block unauthorized device access.

Data Transfer

Content, and the personal data that we collect from you, may be transferred to, stored at and processed by us and our affiliates and other third parties outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By

using our Services, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

Do Not Track Signals and Minors

We do not respond to Do Not Track Signals. If you have questions regarding our policy, please contact us at: support@snaptrakker.com.

Our services are intended for those over the age of legal consent. We do not knowingly collect or solicit any information from anyone under the age of 13. Our services and their respective features are not directed at children under the age of 13.

Sensitive Personal Information

Subject to the next paragraph, we ask that you not send us, and you do not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.

If you send or disclose any sensitive personal data to us when you submit Content to our Services, you consent to our processing and use of such sensitive personal data in accordance with this policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such user generated content to our Services.

Amendments

We may periodically update this policy. We will notify our users about significant changes to this Privacy Policy by sending a notice to the user's primary email address listed with us, or by placing a prominent notice on our website.

This policy's effective date is June 4, 2019.