

Redshield

PRIVACY POLICY

This Policy describes the information that we gather from you on the Service, how we use and disclose such information, and the steps we take to protect such information. By using the Service, you consent to the privacy practices described in this Policy.

This Policy is incorporated into and is subject to the Redshield Terms of Use. Capitalized terms used but not defined in this Policy have the meaning given to them in the Redshield Terms of Use.

The information we collect on the Service:

User-provided Personal Data. When you use the Service, we may collect information about you, including your name and email address. For the purposes of this Privacy Statement, we refer to such information as “Personal Information.” You may provide us with Personal Information in various ways on the Service. For example, you provide us with Personal Information when you register for the Service, download and install our mobile applications, make a purchase on the Service, or send us customer service-related requests.

- **Information from Other Sources.** We may obtain information, including Personal Information, from third parties and sources other than the Service, such as our partners and advertisers. If we combine or associate information from other sources with Personal Information that we collect through the Service, we will treat the combined information as Personal Information in accordance with this Policy.
- The data we collect depends on the context of your interactions with us, the choices you make, including your privacy settings, and the products and features you use. The data we collect can include SDK/API/JS code version, browser, Internet service provider, IP address, platform, timestamp, application identifier, application version, application distribution channel, independent device identifier, iOS ad identifier (IDFA), Android ad master identifier, network card (MAC) address, and international mobile device identification code (IMEI) The equipment model, the terminal manufacturer, the terminal device operating system version, the session start / stop time, the location of the language, the time zone and the network state (WiFi and so on), the hard disk, the CPU, and the battery use, etc.

How we use the information we collect. We use information we collect on the Service in a variety of ways in providing the Service and operating our business, including the following:

- We use the information that we collect on the Service to operate, maintain, enhance and provide all features of the Service, to provide services and information that you request, to respond to comments and questions and otherwise to provide support to users.
- We may use your email address or other information we collect on the Service (i) to contact you for administrative purposes such as customer service or (ii) to send communications, including updates on promotions and events, relating to products and services offered by us and by third parties we work with. Generally, you have the ability to opt-out of receiving any promotional communications as described below under “Your Choices.”
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve Redshield applications, services, and customer communications.
- For security purposes. We process your personal information to: improve and enforce our security measures; combat spam, malware, malicious activities or security risks; and to monitor and verify your identity so that unauthorized users do not access your account with us. We cannot ensure the security of our Services if we do not process your personal information for security purposes.

Designated Countries: For all purposes listed above, pursuant to the EU General Data Protection Regulation (“GDPR”) or any equivalent legislation (collectively “Data Protection Laws”), we process the personal information of users located in the European Economic Area (“EEA”), United Kingdom and Switzerland (collectively, the “Designated Countries”) based on our contract with you.

Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as occupation, language, zip code, area code, unique device identifier, referrer URL, location, and the time zone where a Redshield applications is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website, and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure quality of our services over the Internet, such information will not be associated with your IP address.
- With your explicit consent, we may collect data about how you use Redshield applications in order to help app developers improve our apps.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

When we disclose information. Except as described in this Policy, we will not disclose your information that we collect on the Service to third parties without your consent.

We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

- We work with third party service providers to provide website, application development, hosting, maintenance, payment processing, and other services for us. These third parties may have access to or process your information as part of providing those services for us. Generally, we limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such information.

- To improve our product and provide you better service, we also share personal data with vendors or agents working on our behalf for the purposes described in this privacy policy. For example, companies we've hired to provide data analytical services may need collect and access to personal data to provide those functions. In such cases, these companies must abide by our data privacy and security requirements.
- We may disclose your information if required to do so by law or in the good-faith belief that such action is necessary to comply with state and federal laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.
- We also reserve the right to disclose your information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.
- Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

Legal Basis for Data Processing

We process Personal Data for the purposes set out in this Privacy Policy, as described above. Our legal basis to process personal data includes processing that is: necessary for the performance of the contract with you (for example, to provide you with the services you request and to identify and authenticate you so you may use the Sites); necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you, to ensure the security of our services, to communicate with you about our products and services); and based on consent by our customers (for example, to place certain cookies and to share your information with third parties for advertising purposes).

In some instances, you may be required to provide us with Personal Data for processing as described above, in order for us to be able to provide you all of our services, and for you to use all the features of our Sites.

Your Choices

You may, of course, decline to share certain Personal Information with us, in which case we may not be able to provide to you some of the features and functionality of the Service. You may update, correct, or delete your account information and preferences at any time by contacting us at customer@redshieldsecurity.com. If you wish to access or amend any other Personal Information we hold about you, you may contact us at customer@redshieldsecurity.com. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so. Where the use of your information is based on consent, you can withdraw this consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. Requests should be submitted by contacting us through customer@redshieldsecurity.com.

If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving commercial email from us, and any other promotional communications that we may send to you from time to time, by sending your request to us by email at customer@redshieldsecurity.com or by writing to us at the address given at the end of this policy. We may allow you to view and modify settings relating to the nature and frequency of promotional communications that you receive from us in user account functionality on the Service.

Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten business days for us to process your request, and you may receive promotional communications from us that you have opted-out from during that period. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

Third-Party Services

The Service may contain features or links to Web sites and services provided by third parties for in-app purchase related matters. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

Children's Privacy

Protecting the privacy of young children is especially important. Our Site is a general audience site not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13 without obtaining parental consent. If you are under 13 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Information has been collected on the Service from persons under 13 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 13 years of age has obtained an account on the Service, then you may alert us at customer@redshieldsecurity.com and request that we delete that child's Personal Information from our systems.

Location-Based Services

To provide location-based services on Redshield applications, Smart Technologies & Investment Ltd and our partners and licensees may collect, use, and share precise location data, including the real-time geographic location of when you use Redshield applications. Where available, location-based services may use GPS, Bluetooth, and

your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by Redshield and our partners and licensees to provide and improve location-based services.

Some location-based services offered by Smart Technologies & Investment Ltd, such as the "Catch Intruders" feature, require your personal information for the feature to work.

Data Security

We use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Data that we collect and maintain. When your personal data is stored by Redshield, we use computer systems with limited access housed in facilities using physical security measures. We cannot, however, ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

When you use some share and post on Redshield Applications or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

International Visitors

The Service is hosted in the United States and is intended for visitors located within the United States. All the information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from United States law, then please note that you are transferring your Personal Information outside of those regions to the United States for storage and processing. Redshield abides by the "safe harbor" frameworks set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information collected by organizations in the European Economic Area and

Switzerland. Learn more about the U.S. Department of Commerce Safe Harbor Program.

Also, we may transfer your data from the United States and to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including Personal Information, on or to the Service, you consent to such transfer, storage, and processing. For customers who are located in European Economic Area (“EEA”), when we transfer your data, we take appropriate steps to ensure that recipients of your Personal Data are bound to duties of confidentiality and we implement measures such as standard contractual clauses as permitted under the Data Protection Laws. A copy of those clauses can be obtained by contacting our Help Center. Specifically, when your personal information is transferred out of the Designated Countries, we have the required contractual provisions for transferring personal information in place with the third-parties to which your information is transferred. For such transfers, we rely on legal transfer mechanisms such as Standard Contractual Clauses or we work with U.S. based third parties that are certified under the EU-U.S. and Swiss-U.S. Privacy Shield Framework.

Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision. In the event that the modifications materially alter your rights and obligations, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Services for the first time after such material changes are made. Your continued use of the Services after the revised Policy has become effective indicates that you have read, understood, and agreed to the current version of the Policy.

Retention of Personal Information.

We will try to limit the storage of your personal information to the time necessary to serve the purpose(s) for which your personal information was processed, to enforce our agreement, policies or terms, to resolve disputes, or as otherwise required or permitted by law. Please contact us if you have any questions about our retention periods. While retention requirements can vary by country, we generally apply the retention periods noted below.

- **Marketing.** We store information used for marketing purposes indefinitely until you unsubscribe. Once you unsubscribe from marketing communications, we

add your contact information to our suppression list to ensure we respect your unsubscribe request.

- **Your Interactions and Content on Our Services.** We may store any information about your interactions on our Services or any content created, posted or shared by you on our Services (e.g., pictures, comments, support tickets, and other content) indefinitely after the closure your account for the establishment or defense of legal claims, audit and crime prevention purposes.
- **Web Behavior Data.** We retain any information collected via cookies, clear gifs, flash cookies, webpage counters and other technical or analytics tools up to one year from expiry of the cookie or the date of collection.
- **Telephone Records.** As required by applicable law, we will inform you that a call will be recorded before doing so. Any telephone calls with you may be kept for a period of up to six years.

Your California Privacy Rights

Under California Civil Code Section 1798.83, California customers have the right to request a disclosure describing what types of personal information we have shared with third parties for their direct marketing purposes, and with whom we have shared it, during the preceding calendar year. You may request a copy of that disclosure by contacting us at customer@redshieldsecurity.com, or by sending a letter to the address listed below. In your request, please specify that you want a “California Privacy Rights Notice.” Please allow at least thirty (30) days for a response.

In addition, if you are a California resident under the age of 18 and are a registered user of the Services, you may request that we remove content or information that you posted on Services or stored on our servers by: submitting a request as provided in the “How to Contact Us” section and (ii) clearly identifying the content or information you wish to have removed and providing sufficient information to allow us to locate the content or information to be removed.

However, please note that we are not required to erase or otherwise eliminate content or information if:

- other state or federal laws require us or a third party to maintain the content or information;

- the content or information was posed, stored, or republished by another user;
- the content or information is anonymized so that the minor cannot be individually identified;
- the minor does not follow the instructions posted in this Privacy Policy on how to request removal of such content or information; and (e) the minor has received compensation or other consideration for providing the content.

Further, nothing in this provision shall be construed to limit the authority of a law enforcement agency to obtain such content or information.

Our Contact Information

Please contact us with any questions or comments about this Policy, your Personal Information, our use and disclosure practices, or your consent choices by email at customer@redshieldsecurity.com.