

PRIVACY POLICY

SpotAware Privacy Policy

SpotAware is committed to protecting your privacy and developing technology that gives you a powerful and safe online experience. This Privacy Policy (the "Policy") applies to the System and Services and governs online data collection and usage. By using the System or Services you consent to the data practices described in this Policy. All capitalized words not defined herein shall have the meanings ascribed to them in the Terms of Use.

Collection of your Personal Information

SpotAware collects personally identifiable information, including, but not limited to, your e-mail address, name, job title, company name or organization name, and telephone number. Additionally, provided you consent, SpotAware may collect location data received from a GPS-enabled mobile device or other mechanism that you have set up in order to show your location to other Users or provide information, including target advertising or promotions, to you specific to your geographic locality via the System. Many GPS-enabled mobile devices allow users to "turn off" location-enabling data being sent to SpotAware or any other party. If you do not wish to provide us with your location, please disable the location-enabling functionality on your device or simply update your preferences on the System to preclude collection of your location data. SpotAware may also collect anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests, and favorites.

There is also information about your computer or mobile device hardware and software that is automatically collected by SpotAware. This information can include: your IP address, mobile device type and model, browser type, device ID, domain names, access times and referring web site addresses. This information is used by SpotAware for the operation of the System, to maintain quality of the System, and to provide general statistics regarding use of the System.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through the System or Services (including, for clarity, the Communication Services), this information may be collected and used by others. (Note: SpotAware does not read any of your private online communications with others Users of the System or Services.)

We will retain your personally identifiable information for the period necessary to fulfill the purposes outlined in this Policy unless otherwise required or permitted by law.

Collection of the Personally Identifiable Information of Others

In addition to you personally identifiable information, SpotAware also may collect the personally identifiable information of others. If you so choose, the System may be used to upload and store your contacts (or individual entries) as part of the Services, for the purpose of enhancing your experience and growing your network by leveraging these contacts in various ways, including (i) suggesting potential contacts through the System with whom you have not yet connected, (ii) giving you the option to choose whether to invite contacts in your address book who are not yet users of the SpotAware System or Services to use SpotAware in order to grow you SpotAware network, and (iii) any other services or tools which SpotAware may acquire or develop in the future to enhance your experience using the System and the Services. Information of your contacts may include names, e-mail addresses, phone numbers, and other identifiers. Your contacts information may be uploaded to the system directly from the devices you use to access the System or by explicitly granting the System authorization to access your contacts information stored on third party sites or services.

Third Party Web Sites

You may have the option to enter third party sites or pages through the System. SpotAware cannot be assured that such third party sites or pages follow SpotAware's, or equivalent, privacy policies. As such, we have no responsibility or liability for the actions or policies of such third party sites or pages, nor do we endorse any product or service that may be mentioned or offered in such sites, and are not otherwise responsible for the content or privacy practices of such sites.

Use of your Personal Information and the Personal Information of Others

SpotAware collects and uses your personally identifiable information and such other personally identifiable information of others you may provide us, to operate the System and deliver the services you have requested. SpotAware also uses your personally identifiable information to inform you of other products or services available from SpotAware and its affiliates. SpotAware may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered by SpotAware .

SpotAware may monitor the websites and pages our customers visit within the System, in order to determine what SpotAware services are the most popular among SpotAware's customers or users. This data is used to deliver customized content and advertising within the System to customers whose behavior indicates that they are interested in a particular subject area.

Except as set forth in this Policy, we will not use, disclose, or transfer your personally identifiable information or the personally identifiable information of others you have provided us unless (1) you expressly authorize us to do so; (2) it is necessary to allow our service providers or agents to provide services for us, (3) it is necessary in order to provide our products or services to you (and contacting you when necessary), (4) we are sending you other information that may be useful to you, (5) subject to applicable contractual or legal restrictions, it is disclosed to entities that perform marketing services on our behalf or to other entities with whom we have joint marketing agreements, (6) it is necessary to protect the confidentiality or security of your records, (7) subject to applicable contractual or legal restrictions, it is necessary in connection with a sale of all or substantially all of the assets of SpotAware or the merger of SpotAware into another entity or any consolidation, share exchange, combination, reorganization, or like transaction in which SpotAware is not the survivor, (8) it is necessary in connection with other business purposes including, without limitation, customer care, service quality, business management and operation, risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, marketing, customer purchasing preferences and trends and dispute resolution, (9) it is necessary to comply with law enforcement, governmental mandate, or other legal requirement, if appropriate, for your protection or in connection with an investigation or prosecution of possible unlawful activity; (10) it is necessary for us to provide it to our attorneys, accountants, regulators, auditors or other advisors; or (11) it is otherwise necessary for us to disclose it as required or permitted by law.

We use various web site analytics tools and technologies regarding activities on our web sites that require storage of web session data. The overall aim of these tools is to aid in making our web sites easy to use, to proactively identify and correct error conditions and to provide more relevant advertising and content to you. These tools and technologies are also used to assist web site visitors who report problems in the use of our web sites. Stored web session data is used in accordance with this privacy policy.

Disclosure of Personally Identifiable Information to Third Parties

SpotAware does not sell, rent, or lease its customer lists or the identity of individual customers to third parties. SpotAware may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information is not transferred to the third party.

SpotAware may share personally identifiable information with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are contractually prohibited from using personally identifiable information provided by SpotAware except to provide these

services to SpotAware, and they are required to maintain the confidentiality of your information with equal or greater protections than those provided by SpotAware.

SpotAware shall not use or disclose sensitive personally identifiable information, such as race, religion, or political affiliations to any entity, except as required by statute, regulation, or order of a government tribunal, without your express consent.

SpotAware will disclose your personally identifiable information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on SpotAware or the System; (b) protect and defend the rights or property of SpotAware; and, (c) act under exigent circumstances to protect the personal safety of users of SpotAware or the public.

Additionally, with respect to personally identifiable information of third parties provided to us by you via the System, we do not share such information with any other users of the System or third parties, unless (i) you expressly authorize us to do so, or (ii) we are required to do so by operation of law or regulatory requirement.

Use of Cookies

The System use cookie technology to help you personalize your online experience. A "cookie" is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to alert a web server that you have returned to a specific page. For example, if you personalize SpotAware pages, or register with SpotAware sites or services, a cookie helps SpotAware to recall your specific information on subsequent visits. This simplifies the process of recording your personally identifiable information, such as billing addresses, shipping addresses, and so on. When you return to the same System, the information you previously provided can be retrieved, so you can easily use the SpotAware features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the SpotAware services or web sites you visit.

Security of your Personally Identifiable Information

SpotAware secures your personally identifiable information, and the personally identifiable information of others, from unauthorized access, use or disclosure.

SpotAware secures such personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personally identifiable information is transmitted to other web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Communications With SpotAware.

We appreciate your questions and comments about the System and Services and welcome your messages to recipients listed on the System including messages or emails provided to our customer support. We will share your communications with those within our organization who are most capable of addressing the issues contained in your message. We may archive your message for a certain period of time or discard it, but your e-mail address and e-mail will only be used in accordance with this Policy.

Promotions and Advertisements.

We may send you e-mails or other communications and third party advertisements with promotional offers if you opt-in to receiving such communications or advertisements. If you would no longer like to receive special promotion information, advertisements, or other messages from us or third party advertisers, please email at support@spotaware.net, follow the "Unsubscribe" instructions on such messages, or update your setting and preferences on the System. Please allow us a reasonable period of time in order to satisfy your request, as some advertising campaigns or promotions may already be in process at the time you request to no longer be sent such advertisements or promotions.

Contests, Sweepstakes and Other Promotions.

On the System, you may wish to participate in contests, sweepstakes and other promotions that we may offer from time to time. Through these promotions, you may choose to participate in activities such as sharing information found on the System or such social media platforms with others and sending e-mail invitations. In connection with any contests, sweepstakes and other promotions that we may offer from time to time via the System or such platforms, we use the information you provide to administer the contests, sweepstakes and other promotions. Subject to applicable contractual or legal restrictions, we also may use the information to communicate with you, or the other people you select, about our products and services or our partners may use such information to communicate with you about the contests, sweepstakes or other promotions or their products and services. If you choose to participate in these promotions, and are eligible to do so, we may ask you for information such as your name, e-mail address, date of birth and telephone number.

Social Media Platforms and Web sites.

By visiting any of our pages that are contained on a social media platform or web site, you are representing and warranting to us that you have reviewed the applicable privacy policy and terms of use of such platform or web site and that you will abide by all such provisions contained therein.

SpotyAware offers social-type features on the System, please be aware that these areas may allow you to publicly post, and share with other users, certain messages, content, or other information (e.g., profile updates and information, job postings, pictures, requests for information from other users, recommendations, etc.). Although we may take certain precautions to protect those who use these areas of the System, we encourage you to be wary of giving out any personally identifiable information, or any personally identifiable information of others to which you may have access, in such forums. The information you post can be collected and used by people you don't know. We cannot guarantee the privacy and safety of these areas and are therefore not responsible for any information you choose to post. Your use of these features is fully at your own risk.

Special Policy for Job Applicants.

Any personally identifiable information that you provide to us when applying for a career position with us will be used solely to consider and act upon your application. We may retain your personally identifiable information for a period of time, but only for as long as necessary for such purposes or as otherwise required or permitted by law. We may disclose your personally identifiable information to our agents for the purpose of evaluating your qualifications for the particular position you applied for, for other available positions or as otherwise required by law. We may also disclose your personally identifiable information to third parties hired by us to collect, maintain, and analyze candidates for career positions or as otherwise required by law.

No Information Collected from Children

SpotAware will never ask for or knowingly collect information from children. We are strongly committed to preserving online privacy for all of our web site visitors, including children. We do not knowingly collect information about children or sell products to children. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 13. Furthermore, we may restrict entries to any contests, sweepstakes or promotions to entrants who are at least 18 years of age.

Changes to this Policy

We may change this Policy at any time and from time to time. The most recent version of the Policy is reflected by the version date located at the bottom of this Policy. If we make any material changes to our Policy, those changes will apply to the personally identifiable information collected after the effective date listed on the Policy, and we will notify you by placing a notice on the System prior to the change becoming effective. We encourage all users to periodically review this Policy for the latest information on our privacy practices.

Contact Information

SpotAware welcomes your comments regarding this Policy. If you believe that SpotAware has not adhered to this Policy, please contact SpotAware at support@spotaware.net. We will use commercially reasonable efforts to promptly determine and remedy the problem.

This Policy was last updated on October 10, 2016