

# Nearbuy Systems Privacy Policy

Effective date: 19 December 2012

This policy relates to Nearbuy Systems' practices regarding data of its customers and end users. Our customers may have different practices, and you should review their privacy policies to determine their practices.

## What We Collect

Our services work in connection with our customers' networking hardware to enable them to offer and monitor wireless Internet services and to collect data about the presence of Wi-Fi-enabled devices in or near their facilities.

**Location Detection.** Nearbuy Systems determines the approximate location of a Wi-Fi device by observing broadcasts from that device. Individual devices are identified by a unique number assigned to the device when it was manufactured (called a "MAC address"). Nearbuy Systems records the MAC address of these broadcasts along with the time, the signal strength, and the location of the observing Wi-Fi base stations. For the purpose of location calculation, Nearbuy Systems does not store the payload of Wi-Fi packets (meaning the data that end users are sending or receiving over a Wi-Fi network).

**Guest Wi-Fi Internet Service.** When customers use our service to offer Wi-Fi Internet "hotspots" at their locations, registration is sometimes required. Registration data from these services is sent to us, but the exact nature of that information is determined by our customers. Some customers only require that users read and acknowledge the terms & conditions of use, but others may request personal information like name, telephone number, or email address. Information about the web browser used for registration, like the device type, operating system, and browser version, is also collected automatically.

We also collect information about use of the World Wide Web by observing outbound HTTP requests (non-secure web page requests), which may include web browser information, the URL (web address) of each page visited, search terms used, products viewed and saved on retail websites, and information entered into online forms. Information transmitted over secure connections (such as over HTTPS or a VPN) is not collected.

**Visiting our Website.** We use cookies (a small text file placed on your computer to identify your computer and browser) and/or Web beacons (a file placed on a website that monitors usage) to improve the experience of our website. You can reset your Web browser to refuse all cookies or to indicate when a cookie is being sent.

## Who We Share With

Our customers have full access to the data we collect on their behalf. Their use of the data is governed by their privacy policies, and our customers may direct us to share data we collect

with third-party service providers acting on their behalf.

We also contract with third-party service providers, such as virtual hosting infrastructure providers, to host our servers and databases and to provide other services to us. It is our policy to request that our service providers to agree not to access or use any information or data they may have access to while providing services to Nearbuy Systems other than as specified by us. Storage of this data is not always in your home country and may be transported across borders. As of the date of writing this, we store data in the United States, but we may add additional storage sites without notice.

## **Security**

Once data is received by our system from our customers' network equipment, it is our policy to encrypt it as it passes between our internal services, and to encrypt it when it is at rest. We take steps, like employing firewalls and two-factor authentication, to safeguard sensitive data and prevent unauthorized access to it.

## **Government Requests**

Notwithstanding anything to the contrary in this policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, or legal request or to protect the safety, property, or rights of Nearbuy Systems or others. However, nothing in this policy is intended to limit any legal defenses or objections that you may have to a third party or government request to disclose your information.

## **Data Retention**

Our customers determine how long data is retained in our system, and we place limits on the amount of time personally-identifiable data may be retained to comply with applicable laws.

## **Data Access, Correction, Deletion**

If you wish to access, correct, or delete data collected about your device, you may submit a request to the contact info below. Provided you have provided us with sufficient information to identify you and verify your identity, we will use reasonable efforts to comply with your request where legally required.

You may opt out of some portions of the service by discontinuing your connection to our customers' guest Wi-Fi networks.

You may opt out of other portions of the service (like location detection) by submitting a request to the contact info below. Provided you have provided us with sufficient information to identify you and verify your identity, we will use reasonable efforts to comply with your request where legally required.

When you opt out, we will take measures to avoid collecting data about your device. When it

cannot be avoided, we take measures to delete data about your device before it is shared with our customers.

## **Change of Control**

If Nearbuy Systems is involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your information may be sold or transferred as part of that transaction. The promises in this policy will apply to your information as transferred to the new entity, including your right to request to opt out of the service as described above.

## **Changes and Contact Info**

From time to time, we need to make changes to our Privacy Policy to account for new features or for other reasons. When such changes occur, you are able to view the new document on our site. If you have concerns about our policy, please forward them to [legal@nearbuysystems.com](mailto:legal@nearbuysystems.com) and we'll try to respond promptly.