

## NetraDyne Privacy Policy

*Last Changes to Privacy Policy: March 13, 2017*

NetraDyne, Inc. (collectively “NetraDyne” or “we,” “us,” or “our”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes the types of information and data we may collect from you or that you may provide when you visit the website <http://www.netradyne.com> (our “Website”), and our user portal. This Policy describes, our practices for collecting, using, maintaining, protecting, disclosing, sharing, and storing that information and data. This Policy is applicable to data and information we collect:

- On this Website, including any other website operated by us and linked to this policy (including the versions optimized for viewing on wireless or tablet devices).
- Through our user portal.
- In email, texts, and other electronic messages between you and this Website or you and our user portal.
- Through all email newsletters published or distributed by us.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser based interaction between you and this Website or user portal.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy. This Policy may change from time to time (see *Changes to This Policy*, below). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates.

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## What Information Does NetraDyne Collect and Store?

We collect two types of information – personal and non-personal - from you in conjunction with your use of the Website or user portal. Personal information is any information that can individually identify you and can include, among other things, your name, image, voice, e-mail address, telephone numbers, postal address, billing and contact information. Personal information is information that you may supply to us such as when you write to us via the Website, complete a survey, provide your e-mail address, or use our iDriver and connected service. Non-personal information includes information that is about you but does not personally identify you. Non-personal information may include tracking and usage information about your location, demographics, internet connection, the equipment you use to access our Website, and your use of the Website and the Internet.

## Personal Information – How It Is Collected

Although we enable you to set up an account, you do not need to set up an account to view the Website and you can browse the Website without submitting your personal information to us. However, there are a number of circumstances in which you may supply us or our agents with your personal information. The following lists the most common ways in which we may collect personal information from you:

- Signing up to receive alerts or other information via email, text or instant message from NetraDyne.
- When you register and set up an account on our Website or user portal.
- Location, sound, and imaging information and data collected through iDriver.
- When you fill in forms on or upload information or data to our Website. This includes information provided at the time of purchasing NetraDyne products, subscribing to our services, when requesting further services, or when reporting a problem.
- Details of transactions that you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order on our Website.

- Requesting customer service or other assistance, including records and copies of your correspondence (including email address), if you contact us.
- We collect information related to how you use our services, including actions you take in your account or through our user portal (like sharing, editing, viewing, and moving files or folders).
- Your responses to surveys that we might ask you to complete.
- Submission of content or other data and information on any part of the Website as may be permitted.
- Any other place on the Website where you knowingly volunteer personal information, including your email address and any public comments or postings on the site.
- Information collected about you from third parties, for example, our business partners or customers.

## Non-Personal Information

In addition, when you interact with the Website we may collect certain information that does not identify you individually and our servers may automatically keep an activity log of your use of our Website (“Non-Personal Information”). Generally, we may collect and store the following categories of Non-Personal Information:

- Non-identifiable demographic data such as age, gender, and five-digit zip code as part of collecting personal information.
- Information about your computer, browser, mobile device, or another device that you use to access the Website. This information may include IP address, geolocation information, unique device identifiers, browser type, browser language, and other transactional information collected through cookie and other tracking technologies.
- Analytics and usage information about your use and navigation of the Website, including search queries.
- Additional “traffic data” and log files such as time of access, date of access, software crash reports, session identification number, access times, and referring website addresses.
- Other information regarding your use of the Website.

## Collection of Your Source IP Address/Location Information

We will collect and store location information about you on the Website or user portal and associated with your account, if any, that you volunteer on the Website or enable through the Website. We will not collect any location information that you do not volunteer or enable, we will delete any location information that you request is deleted. We do collect and store your device’s source IP address which may disclose the location of your device at the time you access the Website.

## Collection of Personal Information from or Through Social Media Sites

When you interact with any NetraDyne page or account on a social media platform, such as Facebook, Twitter, Google+, Tumblr, LinkedIn, YouTube, or Pinterest, we may collect the personal information that you make available to us on that page or account including your account ID or “handle.” However, we will comply with the privacy policies of the corresponding social media platform and we will only collect and store such personal information that we are permitted to collect by the social media platform.

## Collection of Personal and Non-Personal Information from Other Sources

We also may collect and store information about you that we receive from other sources (including by us from our offline interactions with you or from our mobile products and application) to, among other things, enable us to update and correct the information contained in our database and to better customize your experience on the Website.

## Collection of Personal and Non-Personal Information Through Surveys

From time to time we may provide you with the opportunity to participate in a survey through our Website. The survey may be sponsored or conducted by a third party. If you participate, we will request certain personal information from you. Participation in surveys is voluntary and you therefore have a choice whether to disclose this personal information. If there is a third-party sponsor involved, please make sure to review that party's privacy policy.

## Use of Cookies, Flash Cookies, Web Storage, and Web Beacons

Like many websites, we use "cookies," small text files that is stored on your computer or equipment when you visit certain online pages. Cookies record your preferences and actions. We may also use cookies to monitor traffic, improve the Website and make it easier and/or relevant for your use. We use both "session" cookies and "persistent" cookies. We use cookies for the other purposes set out below:

- In the event our Website allows you to create an account, we use cookies to remind us who you are and to find your account information in our database when you access the Website so you do not need to log in at every visit. This helps us to provide you with service tailored to your specific needs and interests. A cookie is created when you register.
- We use cookies to determine the browser the visitor uses so the Website can be designed to work properly with the most common versions of different browsers.
- If we offer ads, Advertisers that place ads on the Website may use cookies.
- We use cookies to estimate our audience size. Your browser is given a unique cookie that helps us determine whether your cookie is a repeat visit or a first visit.
- You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but, if you prefer, you can usually modify your browser setting to decline cookies. If you delete your cookies or if you set your web browser to decline cookies, some features of the Website may not work or may not work as designed. For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We may use flash cookies, web storage, web beacons or other technology that tracks your browsing history across multiple websites. Flash cookies are not managed by the same browser settings as are used for browser cookies. Pages of our Website and our emails may contain small electronic files known as web beacons, which are also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

## Is Personal Information Collected from Children?

NetraDyne does not knowingly collect personal identifiable information from children under 13 years of age. If you are under 13 years of age you should not provide personally identifiable information to NetraDyne without providing us with consent from your parents or legal guardians. If NetraDyne discovers that a child under the age of 13 has provided NetraDyne with personally identifiable information and we do not have parental consent, NetraDyne will immediately delete that child's information from the Website. If you believe we might have information from or about a child under 13, please contact us at [support@netradyne.com](mailto:support@netradyne.com)

## How Do We Use Your Information?

We use the information we learn from you as described in this Policy to help us personalize and continually improve your experience on the Website and/or user portal. We may use your Personal and Non-Personal Information in the following ways:

### General Uses

- Communicate with you about your transactions with us (including information related to product sales transactions with you, and product related announcements).
- To provide you with notices about your account, including renewal and expiration notices as applicable.
- To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.
- Communicate with you and send you information about features and enhancements on our Website.
- Communicate with you about changes to our policies.
- Personalize content and experiences on our Website including providing you reports, recommendations and feedback based on your preferences.
- Disclose anonymized Personal Information.
- Optimize or improve our products, analytics, services, Website and operations.
- Detect, investigate, and prevent activities that may violate our policies or be illegal.
- Perform statistical, demographic, and marketing analyses of users of our products, services, and Website.

### Use of Location Information

Specifically, we use location information to:

- Personalize content on our Website and user portal including providing you with access to information about other reports, recommendations and feedback based on your feedback, if any.
- Optimize or improve our products, services, Website and operations.
- Detect, investigate, and prevent activities that may violate our policies or be illegal.
- Perform statistical, demographic, and marketing analyses of users of our products, services, and Website and their patterns.

## Combination of Your Personal Information

We use the information from one portion of the Website on other portions of Website in reports and analysis, all of which are owned and operated by NetraDyne, and we may combine information gathered from multiple portions of the Website into a single customer record or analysis or report. We also use and/or combine information that we collect off-line, from our vehicle devices, or we collect or receive from third party sources to enhance, expand, and check the accuracy of your customer records.

## Who Do We Provide Your Information to?

We may disclose any information with your consent including to fulfill the purpose for which you provided it. We may disclose aggregated information about our users and information that does not identify any individual without restriction. With regard to Personal Information, except as disclosed in this Privacy Policy, we do not disclose Personal Information collected online to any companies not part of NetraDyne or our parent, subsidiaries or related entities. We will not sell or rent your Personal Information as part of a customer list or similar transaction. Please note that if your account is related to your employment or engagement with one of our customers this does not apply because they are the account holder, not you.

## Business Partners and Third Parties

As described in this Policy, we may share your Personal Information with our business partners, including channel partners and service providers or co-marketers. Although our treatment of your Personal Information is governed by this Privacy Policy, the business partner or third party's treatment of your Personal Information will be governed by the business partner or third party's privacy policy. You may withdraw your consent to our sharing of your Personal Information with business partners and third parties at any time by following the opt-out process described below. However, if your account is related to your employment or engagement with one of our customers this does not apply because they are the account holder, not you.

## Third-Party Agents

We have contractors, third party agents, subsidiaries, affiliates and partners that perform functions on our behalf, such as hosting, billing, push notifications, storage, bandwidth, content management tools, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that Personal Information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services to the Website.

## Legal and Emergency Situations

We may also use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to: (a) conform to applicable law or comply with legal papers served on us or the Website, including responding to any government or regulatory request (b) protect and defend our rights or property, the Website, user portal, databases or our other users, and (c) act under emergency circumstances to protect the safety of us, our affiliates, agents, or the users of the Website, user portal, or the public. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

## Buyer or Successor

We may disclose personal information that we collect or you provide to a buyer or other successor in the event of an assignment, merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of NetraDyne's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by NetraDyne about our Website or user portal users is among the assets transferred. Under such circumstances, we would to the extent possible, require the acquiring party to follow the practices described in this Privacy Policy, as it may be amended from time to time. Nevertheless, we cannot promise that an acquiring company or the merged company will have the same privacy practices or treat your information the same as described in this Privacy Policy.

## NetraDyne E-mail Communications

E-mail communications sent from us are designed to make your Website experience more efficient. By participating in the Website you specifically agree to accept and consent to receiving e-mail communications initiated from us, which include, without limitation: message notification e-mails, e-mails informing you about new and existing products we provide.

## What Steps Are Taken to Keep Personal Information Secure?

We are concerned about ensuring the security of your Personal Information. We exercise great care in providing secure transmission of your information from your computer, phone, or tablet to our servers. Personal Information collected by our products, services, or Website is stored in secure operating environments that are not available to the public. All information provided to us is stored on secure servers behind firewalls. Our security procedures mean that we may occasionally request proof of identity before we disclose your Personal Information to you. Please understand, however, that while we try our best to safeguard your Personal Information, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure, and any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or user portal.

## How Can We Transfer Your Personal Information?

Your information collected through the Website or user portal may be stored and processed in the United States or any other country in which NetraDyne, its affiliates or service providers maintain facilities. NetraDyne, our affiliates, or service providers may transfer information that we collect about you, including personal information across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the United States or other regions with laws governing data collection and use that may differ from US law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction. By registering for and using our product, service, user portal, or Website you consent to the transfer of information to the US or to any other country in which NetraDyne, our affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.



## How Long Do We Keep Your Information?

Following termination or deactivation of your account, NetraDyne, its affiliates, or its service providers may retain information (including your profile information) for a commercially reasonable time for backup, archival, analysis, marketing, optimization, and/or audit purposes. We may retain aggregated information that does not identify any individual indefinitely. If you have any questions about termination or deactivation of your account, please contact us directly at [support@NetraDyne.com](mailto:support@NetraDyne.com).

## Your California Privacy Rights

California Civil Code Section 1798.83 provides that users of NetraDyne's Website who are California residents may request certain information regarding NetraDyne's disclosure of their personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [support@NetraDyne.com](mailto:support@NetraDyne.com). This Website will respect your browser's Do Not Track signals (or other well-established, commercially available mechanisms that provide you with the ability to exercise choice regarding the collection of personal information). If we receive a Do Not Track notice, we will stop using any personal information for online behavioral advertising purposes if we are conducting such activity.

## Governing Law

This Website is published in the United States. We attempt to protect the Personal Information of all users of our Website and user portal. Note, our Website is located and targeted to persons in the United States and our policies are directed at compliance with those laws. If you are uncertain whether this privacy policy conflicts with the applicable local privacy laws where you are located, you should not submit your personal information to NetraDyne.

## Changes to This Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat Personal Information, we will notify you through a notice on the Website and/or user portal homepage. We will also note the date the privacy policy was last revised on this page. We do recommend that you regularly read this Privacy Policy when you use our Website or user portal.

## How Do I Opt-Out of Communications or Correct Information About Me?

You may opt-out of receiving future e-mail messages and communications from NetraDyne. To opt-out, you can send us a message at [support@NetraDyne.com](mailto:support@NetraDyne.com). Please note that if you have an existing account or transactions with us, you will continue to receive communications from us regarding your use of our products and services. You can correct your account information by sending us a message at [support@NetraDyne.com](mailto:support@NetraDyne.com).

## How to Contact Us:

If you have any questions about our privacy policies, please contact us at [support@NetraDyne.com](mailto:support@NetraDyne.com) or by mail at: 4350 Executive Drive, Suite 150, San Diego, CA, 92121.