## **Privacy Policy**

#### PRIVACY POLICY AGREEMENT

CARRAT Sàrl, ("CARRAT" or "we" or "our" or "us"), is committed to keeping any and all personal information collected of those individuals that visit our website or mobile application and make use of our devices, products and services current, confidential, secure and private. This privacy policy agreement ("Privacy Policy Agreement") has been designed and created to ensure those affiliated with CARRAT—including our customers—of our commitment to protecting them through our compliance with this policy.

This Privacy Policy Agreement explains our practices regarding the collection, use maintenance, protection and disclosure of certain information in connection with use of our website www.CARRAT.com, or our application, devices, products, and services (our "Services"). When you (or someone on your behalf) access or use our Services, you agree to this Privacy Policy Agreement. If you do not agree with our policies and practices, your choice is not to use our Services.

## **Collection of Information**

The Services collect various types of information from and about its users ("Personal Information"), such as:

- Voluntarily provided information which may include a user's name, address, email address, race or ethnicity, gender, age, and health information, billing and/or credit card information etc., which may be used when you purchase products and/or Services and to deliver the Services you have requested.
- Real-time location data, as in GPS location information are needed in order to have the CARRAT APP perform..
- Stored information and files, where voluntarily provided, including personal contacts and address book information.
- Device information, which may include information about the user's mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- Information automatically collected when visiting or using our Services, which
  may include details of the user's access to and use of the Services, including
  traffic data, referring/exit pages, date and time of your visit to our website or
  application or use of our Services, error information, clickstream data, other

- communication data and the resources that the end user accesses and uses on or through the application, cookies, third party tracking technologies and server logs. The technologies we use for this automatic data collection may include:
- Cookies (or browser cookies). We use cookies to receive and store certain types of information whenever you interact with our website and application through your computer or mobile device. A "cookie" is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting, you may be unable to access certain parts of our website or use certain parts of our application. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website or use our application.
- Web Beacons. Pages of our website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit CARRAT, 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).
- Third Party Cookies and Tracking Technologies. Our service providers (such as, for example and without limitation: Google, Shopify Klaviyo, DojoMojo, Daasity, Emotive, and Kickbooster) may also use online identifiers such as cookies, web beacons, or other tracking technologies to collect and store information about you (e.g., click stream information, browser type, time and date, subject of advertisements clicked or scrolled over, hardware/software information, cookie and session ID) when you use our website. The information they collect and store may be associated with your Personal Information or they may collect and store information, including Personal Information, about your online activities over time and across different websites and other online services. The Services may analyze the behavior of users to our website or interactions with our emails in order to provide our users with personalized purchase recommendations and to tell which mailings appeal most to our customers. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For example, you can find out more about how Google uses data when you visit our website or

- application by visiting "How Google uses data when you use our partners' sites or apps", located at google.com/policies/privacy/partners/.
- Social Media Advertising Services. We use social media advertising services provided by social media companies, such as Facebook, Instagram, and LinkedIn. These social media companies provide web analytics and related advertising services on or in conjunction with our website. With their help, we and our customers can keep track of what users do after they see or click on a social media advertisement, keep track of users who access our website or advertisements from different devices, and better provide advertisements to our target audiences. The data from social media companies is also saved and processed by the social media sites themselves. Such social media sites can connect this data with your social media accounts and use it for its own and others advertising purposes, in accordance with their privacy notices available on the homepage of each social media website.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Details of your order for our Services. You may be required to provide financial information before placing an order through our website or application.

It is the intent of the Services to use Personal Information only for the purpose for which it was requested and any additional permissible purposes described in this Privacy Policy Agreement.

You also may provide information to be transmitted to third parties you engage (collectively, "User Contributions"). Your User Contributions are transmitted to others at your own risk. Although we limit access to certain information, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of the third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### **We May Combine Information About You**

The information we collect through our Services, automatically, or from third parties may be combined. It helps us to improve our Services and to deliver a better and more personalized service by enabling us to estimate our audience size and usage patterns, store information about your preferences, allowing us to customize our website and application according to your individual interests, speed up your searches, and to recognize you when you return to our website and application.

### **Use of Information Collected**

CARRAT may collect and may make use of Personal Information to present our website, application, and their contents to you, to assist in the operation of our Services, to ensure delivery of the Services you need and request, to provide you with notices about your subscription, including expiration and renewal notices, to carry out our obligations, enforce our rights arising from any contracts entered into between you and us, including for billing and collection, to prevent fraudulent transactions, and for purposes of product development and market analysis. At times, we may find it necessary to use Personal Information as a means to keep you informed of changes to our website or application or other possible products and/or Services that may be available to you from www.CARRAT.com. CARRAT may also be in contact with you with regard to completing surveys and/or research questionnaires related to your opinion of current or potential future services that may be offered.

CARRAT may feel it necessary, from time to time, to make contact with you on behalf of other external business partners with regard to potential new offers which may be of interest to you. If you consent or show interest in presented offers, then, at that time, Personal Information, such as name, email address and/or telephone number, may be shared with the third party. If you wish to change your choice, you may do so at any time by sending us an email stating your request at contact@my-carrat.com.

CARRAT may deem it necessary to follow websites and/or pages that our users may frequent in an effort to glean what types of services and/or products may be the most popular to customers or the general public.

## **Disclosure of Information**

CARRAT does not share, sell, or otherwise disclose your Personal Information for purposes other than those outlined in this Privacy Policy Agreement. However, we may also disclose aggregated information about our users, and information that does not identify any individual, without restriction. CARRAT may disclose your Personal Information to:

- Affiliates, contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. These entities provide IT and infrastructure support services, emergency response technology, marketing, advertising and promotion, and payment processing services;
- fulfill the purpose for which you provide it; for example, when you direct us to send an emergency alert to a family member or friend;
- Third parties to market their products or services to you if you have consented to these disclosures;

- Any other third party with your consent;
- Remain in conformance with any decrees, laws and/or statutes or in an effort to comply with any process which may be served upon CARRAT and/or our Services;
- Maintain, safeguard and/or preserve all the rights and/or property of CARRAT;
- Effectuate a corporate change in control resulting from, for example, a merger, a sale of assets, or bankruptcy; and
- Perform under demanding conditions in an effort to safeguard the personal safety of users of www.CARRAT.com and/or the general public.

CARRAT shall maintain and may furnish to law enforcement and/or government entities a sales record, which identifies the customer and item(s) purchased, if and as required by state law.

#### **Choices About How We Use and Disclose Your Information**

We do not control the collection and use of your information collected by third parties described above in Disclosure of Information. When possible, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain this information strictly confidential. These third parties may, however, aggregate the information they collect with information from their other customers for their own purposes. In addition, we strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with control over your Personal Information, which include:

- Promotional Offers from CARRAT. If you do not wish to have your email
  address used by CARRAT to promote our own products and Services, you
  can opt-out at any time by clicking the unsubscribe link at the bottom of any
  email or other marketing communications you receive from us. This opt out
  does not apply to information provided to CARRAT as a result of a product
  purchase, or your use of our Services.
- Tracking Technologies and Advertising. You can set your browser to refuse all
  or some browser cookies, or to alert you when cookies are being sent. To
  learn how you can manage your Flash cookie settings, visit the Flash player
  settings page on Adobe's website. If you disable or refuse cookies, please
  note that some parts of this site may then be inaccessible or not function
  properly.
- Disclosure of Your Information to Affiliates and Third-Parties. By using our Services, you consent to our sharing of your Personal Information with our affiliates and third parties for their promotional purposes. If you wish to

- unsubscribe from such affiliate and third parties' promotions, you can do so by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us or them. If you wish to opt-out of such sharing, please email us at contact@my-carrat.com.
- Targeted Advertising. To learn more about interest-based advertisements and your opt-out rights and options, visit the Digital Advertising Alliance and the Network Advertising Initiative (NAI) websites (aboutads.info and www.networkadvertising.org). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the NAI on its website.

## **Children Under Age of 13**

With parental consent, CARRAT may collect Personal Information from children under the age of thirteen (13). If we learn that we have collected or received Personal Information from a child under the age of thirteen (13) without parental consent, we shall immediately take the necessary steps to ensure that such information is deleted from our system's database. Parents have the right to review their child's Personal Information; to have their child's Personal Information deleted; and to refuse further collection, use, and/or disclosure of their child's Personal Information by notifying us. As a parent, you understand that CARRAT has a legitimate interest in providing your child's Personal Information collected via the Services to external providers for the sole purpose of administering or providing the Services. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission to use our Services.

### **Unsubscribe or Opt-Out**

All users and/or visitors to our Services have the option to discontinue receiving communication from us and/or reserve the right to discontinue receiving communications by way of email or newsletters. To discontinue or unsubscribe to our Services please send an email that you wish to unsubscribe to contact@my-carrat.com. If you wish to unsubscribe or opt-out from any third party websites, you must go to that specific website to unsubscribe and/or opt-out.

## **Your Data Protection Rights**

All users of our Services have data protection rights. Every user is entitled to the following:

- The right to access You have the right to request from us copies of your personal data. We may charge you a small fee for this service.
- <u>The right to rectification</u> You have the right to request that we correct any information you believe is inaccurate. You also have the right to request we complete the information you believe is incomplete or inaccurate.
- <u>The right to erasure</u> You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing You have the right to object to us processing your personal data, under certain conditions.
- The right to data portability You have the right to request that we transfer the
  data that we have collected to another organization, or directly to you, under
  certain conditions.
- If you make a request, we have one month to respond to you.

## Response to Do Not Track Signals

We also may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected through our Services for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser-initiated DNT signals.

### **Links to Other Web Sites**

Our website does contain links to affiliate and other websites. CARRAT does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our website and to read the privacy statements of each and every website that collects Personal Information. The aforementioned Privacy Policy Agreement applies only and solely to the information collected by our website.

# **Security**

We have implemented measures designed to help secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where you have chosen a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information to your emergency contacts for the emergency notification features of the Services, we do not control what your emergency contact does with the information you share through the Services. Before you add a contact for us to provide notifications to, please consider what information you would like shared with that individual.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to or by our Services. 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 Services.

## **Period of Storage of Personal Information**

CARRAT shall store and maintain your Personal Information for so long as you are a customer of our Services. Currently live data is deleted if the customer deletes their account from the mobile app, if the account is inactive for 3 years, or on accordance with state and country laws. The archived data will reside on encrypted database backups and will be purged in accordance with CARRAT's data lifecycle management policy.

## **Changes to Privacy Policy Agreement**

CARRAT reserves the right to update and/or change the terms of our Privacy Policy Agreement; any such changes will be posted to our website homepage at www.CARRAT.com, so that our users are always aware of the type of information we collect, how it will be used, and under what circumstances we may disclose such information. If at any point in time CARRAT decides to make use of any Personal Information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether or not to permit the use of their information in this separate manner.

### **Acceptance of Terms**

Through the use of our Services, you are hereby accepting the terms and conditions stipulated within the aforementioned Privacy Policy Agreement. If you are not in agreement

with our terms and conditions, then you should refrain from further use of our Services. In addition, your continued use of our Services following the posting of any updates or changes to our terms and conditions shall mean that you are in agreement and acceptance of such changes.

Additionally, for all our European customers:

- (1) Your acceptance of the terms and conditions within this Privacy Policy Agreement is your explicit consent for cross-border transfers and processing of personal information from Europe to our servers in the United States of America in compliance with Article 49(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council, commonly known as the General Data Protection Regulation ("GDPR");
- (2) Unlike the European Union, the United States does not have a single, comprehensive national law that regulates the collection and use of personal data. Instead, the U.S. has a complex approach to regulating specific types of personal data involving laws and administrative rules that: (a) are issued by national and state-level governments, and (b) apply to certain industries such as financial service firms and health care providers. Self-regulatory frameworks also exist in the U.S. that provide guidelines and best practices for handling personal data; and
- (3) By transferring your personal data to the U.S., you accept that (a) once your data is transferred to the U.S., it will be subject only to the laws and regulations of the United States and its individual states, (b) those laws and regulations do not afford you the same or equivalent rights as those set forth in the GDPR, and (c) your personal data could become involved in litigation in the event legal action is taken against CARRAT by third-parties.

## **How to Contact Us**

If you have any questions or concerns regarding the Privacy Policy Agreement related to our Services, please feel free to contact us at the following email address. contact@my-carrat.com.