# WalScout PRIVACY POLICY

Effective: June 8, 2021

Walscout LLC, a United States Wyoming Single-member Limited Liability Company (" <u>WalScout</u>", "<u>Company</u>", "<u>our</u>," "<u>we</u>" or "<u>us</u>") is committed to respecting your privacy. This Privacy Policy describes how WalScout collects, uses, discloses, stores and otherwise processes information when you use our websites (" <u>Websites</u>") and other services (such services together with the Websites, the "<u>Services</u>"). We urge you to read this Privacy Policy so that you understand our commitment to your privacy.

BY USING THE SERVICES, YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING IN THE UNITED STATES AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU ARE LOCATED OUTSIDE OF THE UNITED STATES, PLEASE BE AWARE THAT INFORMATION WE COLLECT WILL BE PROCESSED AND STORED IN THE UNITED STATES, A JURISDICTION IN WHICH THE DATA PROTECTION AND PRIVACY LAWS AND PRINCIPLES, INCLUDING YOUR DATA SUBJECT RIGHTS, MAY NOT OFFER THE SAME LEVEL OF PROTECTION AS THOSE IN THE COUNTRY/REGION WHERE YOU RESIDE OR ARE A CITIZEN. BY USING OUR SERVICES AND PROVIDING INFORMATION TO US, YOU CONSENT TO THE TRANSFER TO AND PROCESSING OF THE INFORMATION IN THE UNITED STATES AND, UNLESS OTHERWISE STATED IN THIS PRIVACY POLICY, WalScout USES THIS CONSENT AS THE LEGAL GROUND FOR THAT DATA TRANSFER. WHEN COLLECTING YOUR PERSONAL DATA FOR THE USE OF OUR SERVICES, YOU MAY BE ASKED FOR YOUR EXPLICIT CONSENT TO THIS DATA TRANSFER AS PART OF ACCOUNT CREATION.

Please read this Privacy Policy carefully, as your access to and use of the Services signifies that you have read, understand and agree to all terms within this Privacy Policy. If you do not agree with any part of this Privacy Policy, please do not access or continue to use any of the Services or otherwise submit your Personal Data to WalScout.

Note to Residents of the European Union: In order to comply with the requirements of the European General Data Protection Regulation (" <u>GDPR</u>") for our European consumers and users, this Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

# **Definitions**

The following terms shall have the following definitions:

- " <u>Location Data</u> " shall mean data with respect to the country from which you are accessing or using the Services.
- " <u>Personal Data</u>" shall mean information that can be used to identify you, directly or indirectly, alone or together with other information. This includes information such as your full name, email address, phone number, device IDs, and certain cookie and network identifiers.

# How WalScout Collects and Uses Personal Data.

WalScout collects, uses, discloses and processes Personal Data as outlined in this Privacy Policy, including to operate and improve the Services and our business, for advertising and marketing purposes and as further described in this Privacy Policy. WalScout collects your Personal Data in a number of ways and for various purposes, including:

- (a) When you register for an account or interact with the Services. WalScout collects Personal Data when you use or interact with our Services, including when you register for a Company account, browse our Services online, and, possibly, to make payments (including the possibility of processing of such payments). Personal Data may include name, address, phone number, username and password, email address, date of birth, and payment information. WalScout uses Personal Data to create your Company account, enable your activity within our Services, and to provide the Services generally, including to develop, enhance, and improve our Services and your experience in using such Services. WalScout also uses this data for internal purposes related to certain, analytics, innovation, testing, monitoring, customer communication, risk management, and administrative purposes.
- (b) When WalScout Collects Location Data. WalScout may collect Location Data as part of the functionality of our Services. We may collect Location Data in several ways, such as through your wireless carrier, based on WiFi access point location, via Bluetooth beacons, through a connected device, or directly from the device on which you use the Services.
- (c) When you communicate with WalScout or elect to receive promotional materials. We collect Personal Data when you communicate with us or sign up to receive promotional materials or information via email or other forms of communication (including email address, mobile number, etc.). If you consent to such messages, we may (i) use your Personal Data and other information to communicate with you about the Services; (ii) provide you with promotional messages and personalized advertising; (iii) notify you of other products; (iv) notify you of contests, challenges, sweepstakes, and other promotions ("Promotions"); (v) notify you of Services we think may be of interest to you; and (vi) for other marketing purposes. Please note that regardless of your email settings, we may send you notifications pertaining to the performance of our Services, such as revision of this Privacy Policy or other formal communications relating to products or Services you have purchased or use. We may use your Personal Data to respond to your requests for technical support, online services, product information or to any other communication you initiate. This includes accessing your account to address technical support requests. We may also use your Personal Data to address your requests, inquiries, and complaints.
- (d) When you participate in special activities, offers or programs. WalScout may request or otherwise collect Personal Data when you participate in Promotions, when you participate in surveys, or when you participate in research activities or initiatives ("Research"). This includes Personal Data, such as name, address, email address, telephone number and other information that may be appropriate in order to participate. We may also launch surveys that ask you to

answer questions about a range of topics from Personal Data to brand and product preferences. Promotions or surveys may be run by a WalScout service provider. In such instances, Personal Data may be collected directly by and/or shared with WalScout, the service provider, and/or business partner, including for marketing purposes.

- (e) When you engage with our online communities or advertising. WalScout may collect your Personal Data when you engage with any online communities, to the extent that WalScout has created the same. This includes when you click on advertisements, interact with our social media pages, submit content, leave reviews, or otherwise enter information into comment fields, blogs, message boards, events, and other community forums sponsored by or affiliated with WalScout.
- (f) When you access third party products and services. We may allow you to (i) register and pay for third-party products and services, (ii) pay for the Services, or (iii) otherwise interact with another website, mobile application, or Internet location (collectively " <u>Third Party Sites</u>") through our Services, and we may collect Personal Data that you share with Third Party Sites through our Services.
- (g) When you connect with WalScout through social media. You may choose to enable, log into, or sign on to the Services through various social media or social networking services, such as Facebook or Twitter ("Social Networking Service" or "SNS"). When you connect using your SNS accounts, WalScout may collect Personal Data that you have provided to that SNS. For example, when you log in to the Services with your Facebook credentials, with your consent, WalScout may collect Personal Data from your Facebook profile that is permitted under Facebook's Terms of Use, such as your email address, profile picture, and friend list. WalScout may use this data to provide, enhance, and personalize the Services. If you do not want to provide us with this data, you need to adjust the privacy settings on your SNS account.
- (h) When WalScout collects data from third parties or publicly-available sources. WalScout may obtain certain data about you from third party sources to help us provide and improve the Services and for marketing and advertising. We may combine your Personal Data with data we obtain from our Services, other users, or third parties to enhance your experience and improve the Services, such as providing you with a single point of sign on for our Services and/or building an account dashboard letting you understand how to access and control all the Services you use from a single location.
- (i) When we collect cookies, device ID's, location, and other tracking technologies. We may collect certain Personal Data using cookies and other technologies such as web beacons, device ID's, advertising ID's, HTML5 local storage, Flash cookies, and IP addresses. We specifically use browser cookies for different purposes, including cookies that are strictly necessary for functionality and cookies that are used for personalization, performance/analytics, and advertising.
- (j) When we aggregate or centralize data. WalScout may aggregate and centralize Personal Data for purposes of analytics, innovation, and to provide enhanced services to our customers and end-users.

(k) When we comply with legal requirements or obligations. WalScout may use Personal Data in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Services Agreement or other terms and conditions and agreements, this Privacy Policy, or agreements with third parties, or for crime-prevention purposes.

#### How WalScout Discloses Personal Data.

WalScout may disclose your Personal Data for the purposes as described in Section 2 and in the following ways:

- (a) <u>Affiliates</u>. With companies, ventures or projects that are owned or controlled by WalScout, and internally within WalScout, in order to provide and improve Services, for marketing purposes, and for advertising.
- (b) <u>Service Providers and Vendors</u>. With business partners, marketing partners, vendors and contractors to provide, improve, and personalize the Services.
- (c) <u>SNS Providers</u>. With SNS providers when we use social network widgets, buttons, or plug-ins in our Services.
- (d) <u>Advertising and Marketing Purposes</u>. With advertising and marketing partners for advertising and marketing purposes on WalScout's behalf and on behalf of third parties. With companies involved in interest-based advertising, including web, mobile app and other advertising. This advertising consists of WalScout and third-party advertisements that are personalized and displayed on our sites and apps and through other channels.
- (e) <u>Analytics</u>. With certain companies for purposes of analytics and improvement of the Services.
- (f) <u>Legal Compliance</u>. With law enforcement, government or regulatory bodies, lawful authorities, or other authorized third parties in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Services Agreement and other terms and conditions or agreements, this Privacy Policy, or agreements with third parties, or for crime-prevention purposes.
- (g) <u>Sale</u>. With prospective or actual purchasers, investors, or successor entities in connection with a contemplated reorganization or an actual reorganization of our business, in connection with financing, a sale, or other transaction involving the disposal of all or part of our business or assets, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction, pursuant to assurances of sufficient data handling practices and safeguards.

# Legal Basis for Processing.

This section addresses the legal basis for processing Personal Data if you reside outside of the United States. For the purposes of applicable data protection laws, WalScout is the controller of the Personal Data you provide to us (the "<u>Data Controller</u>"). As a Data Controller, we process the Personal Data we maintain about you in accordance with this Privacy Policy. If you have any questions or concerns regarding the processing of your Personal Data, or if you have questions regarding this Privacy Policy, please see below for appropriate contact information. The following shall apply to users residing in the European Economic Area:

- (a) <u>No Requirement to Participate</u>. You may choose not to provide WalScout with your Personal Data; however, if you choose not to provide your Personal Data, you may not be able to enjoy the full range of Services.
- (b) Rights with Respect to Personal Data. You have the following rights:
- (i) Right of access to your Personal Data (Art. 15 GDPR). You have the right to ask WalScout for confirmation on whether WalScout is processing your Personal Data, and access to the Personal Data and related information on that processing (e.g., the purposes of the processing, or the categories of Personal Data involved).
- (ii) Right to rectification (Art. 16 GDPR). You have the right to have your Personal Data corrected, as permitted by law.
- (iii) Right to erasure (Art. 17 GDPR). You have the right to ask WalScout to delete your Personal Data, as permitted by law. This right may be exercised among other things: (A) when your Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed, (B) when you withdraw consent on which processing is based according to Art. 6(1)(a) or Art. 9(2)(a) GDPR and where there is no other legal ground for processing, (C) when you object to processing pursuant to Art. 21(1) GDPR and there are no overriding legitimate grounds for the processing, or when you object to the processing pursuant to Art. 21(2) GDPR, or (D) when your Personal Data has been unlawfully processed.
- (iv) Right to restriction of processing (Art. 18 GDPR). You have the right to request the limiting of our processing under limited circumstances, including: when the accuracy of your Personal Data is contested, when the processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of the use of your Personal Data instead, or when you have objected to processing pursuant to Art. 21(1) GDPR pending the verification whether the

legitimate grounds of WalScout override your grounds.

- (v) Right to data portability (Art. 20 GDPR). You have the right to receive the Personal Data that you have provided to WalScout, in a structured, commonly used and machine-readable format, and you have the right to transmit that information to another controller, including to have it transmitted directly, where technically feasible.
- (vi) Right to object (Art. 21 GDPR). You have the right to object to WalScout's processing of your Personal Data, as permitted by law. This right is limited to processing based on Art. 6 (1)(e) or (f) GDPR, and includes profiling based on those provisions, and processing for direct marketing purposes. After which, we will no longer process your Personal Data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
- (c) <u>Disclosure</u>. WalScout may disclose your Personal Data in the following ways:
- (i) <u>GDPR</u>. The GDPR permits the sharing of Personal Data relating to users who are residents of the European Economic Area with third parties only under certain circumstances. If you reside in the European Economic Area, WalScout will only share your Personal Data as described in our Privacy Policy if we are permitted to do so under applicable European and national data protection laws and regulations.
- (ii) <u>Marketing</u>. Where WalScout is legally required to do so, we ask you for your prior consent before providing you with promotional materials or information. You may revoke your consent at any time (this will not affect the processing of your Personal Data undertaken until the revocation). If you want to stop receiving promotional materials, etc., you can do by contacting WalScout.
- (iii) <u>Additional use of Personal Data</u>. Additional use of your Personal Data that is not described in this Privacy Policy will only take place as required by statute or when WalScout has obtained your consent.
- (d) <u>Legal Basis for Processing under the GDPR</u>. In this section, WalScout hereby provides information on the legal basis for processing of your Personal Data as required by Art. 13 and 14 of the GDPR:
- (i) When you register for a Company account or interact with our Services, such processing is necessary for the performance of our Services. Art. 6(1)(b) GDPR.
- (ii) When we collect Location Data following your prior consent, we process such data on the basis of your prior consent. Art. 6(1)(a) GDPR. In other cases, where we process your Location Data without consent, for example in order to provide our Services, such processing is necessary for the performance of our Services. Art. 6(1)(b) GDPR.

- (iii) When you communicate with us or sign up for promotional materials, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR) and our legitimate interest is to provide you with our promotional messages. Where we are required under applicable local law to obtain your consent for sending you marketing information, the legal basis is your consent. Art. 6(1)(a) GDPR.
- (iv) When you participate in special activities, offers, or programs. For non-sensitive Personal Data, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR) and our legitimate interest is to provide you with our promotional messages or to allow you to participate in our special activities, offers or programs.
- (v) When you engage with our advertising and we actively collect your Personal Data in this context, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR), and our legitimate interest is to provide you with our promotional messages.
- (vi) When you access third party products and services and we obtain Personal Data about you from such third party sources. For Personal Data that we need in order to perform the Services (e.g. if you pay for third party products through our Services), such processing is necessary for the performance of our Services. Art. 6(1)(b) GDPR.
- (vii) Regarding other Personal Data, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR) and our legitimate interest is to enhance your experience and to improve our Services.
- (viii) When you connect with us through social media, where we obtain your consent in such case (e.g., for marketing purposes), we process such data on the basis of your prior consent. Art. 6 (1)(a) GDPR. Where we do not collect your consent in such case, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR) and our legitimate interest is providing you with better Services and to enable you to use the full range of our Services.
- (ix) When we collect data from third parties or publicly-available sources, for Personal Data which we need in order to perform the Services (e.g., for email verification purposes), such processing is necessary for the performance of our Services. Art. 6(1)(b) GDPR. Regarding other Personal Data, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR) and our legitimate interest is providing you with better Services and to enable you to use our Services more efficiently.
- (x) When we leverage and/or collect cookies, device IDs, Location Data, data from the environment, and other tracking technologies, we process such data on the basis of your consent (Art. 6(1)(a) GDPR), and based on our legitimate interest (Art. 6(1)(f) GDPR), where we do not obtain your consent and our legitimate interest is to provide you with better Services or marketing.
- (xi) When we aggregate or centralize data, such processing is either necessary for the performance of our Services (Art. 6(1)(b) GDPR) or we process such data on the basis of our

legitimate interest (Art. 6(1)(f) GDPR) and our legitimate interest is to provide you with better or customized Services and marketing.

- (xii) When you sign up for our services that consist of social sharing and communication with others, where we collect your consent in such case, we process such data on the basis of your prior consent (Art. 6(1)(a) GDPR) and where we do not collect your consent in such case, such processing is necessary for the performance of our Services (Art. 6(1)(b) GDPR).
- (xiii) When we disclose Personal Data to our affiliates and partners, and to our service providers and vendors, where we collect your consent in such case, we process such data on the basis of your prior consent. Art. 6(1)(a) GDPR. Where we do not collect your consent in such case, such processing is necessary for the performance of our Services (Art. 6(1)(b) GDPR), or we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR), and our legitimate interest is to provide you with better Services and marketing.
- (xiv) When we process or share Personal Data in the event of an actual or contemplated sale, we process such data for our legitimate interest in offering, maintaining, providing, and improving our Services. Art. 6(1)(f) GDPR.
- (xv) When we conduct analytics, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR), and our legitimate interest is to enhance your experience and to develop and improve our Services.
- (xvi) When we investigate suspected illegal or wrongful activity, we process such data on the basis of our legitimate interest (Art. 6(1)(f) GDPR), and our legitimate interest is to ensure compliance with legal requirements and law enforcement requests and for public safety purposes.
- (e) Right to lodge a complaint before the Data Protection Authority. WalScout encourages you to contact us directly and allow us to work with you to address your concerns. Regardless, you have the right to communicate a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of Personal Data relating to you infringes applicable data protection laws.
- (f) <u>Changes to this Privacy Policy</u>. In order to enhance our Services, it might be necessary to change this Privacy Policy from time to time. WalScout reserves the right to modify this Privacy Policy in accordance with the applicable data protection laws. Please visit our Website from time to time for information on updates to this Privacy Policy.
- (g) <u>How to contact us or our Privacy Office</u>. In case of questions about the processing of your Personal Data please contact us at <u>info@walscout.com</u>. If we are required under applicable law to appoint a data protection officer (DPO), you can contact the DPO that is responsible for your country/region at <u>info@walscout.com</u>.

Consent as a Basis for Processing

In some cases, WalScout will ask for your consent to process your Personal Data. You may indicate your consent in a number of ways, including, as permitted by law, checking or ticking a box (or some sort of equivalent action) to indicate your consent when (i) providing us with your Personal Data through our Services or a form; or (ii) registering or creating a Company account. We may request your consent for a number of activities including:

- (a) <u>Marketing and Communication</u>. We may ask for your consent to contact you by telephone, text message, and/or email about other offers, products, events, or Services that we think may be of interest to you and for other marketing purposes.
- (b) <u>Sharing with Third Party Services</u>. We may also ask for your consent to share your Personal Data with certain third party business partners in order to offer certain services or programs. To withdraw consent, please go to the preferences of the specific third party service.
- (c) <u>Third Party Marketing</u>. We may ask for your consent to provide Personal Data to allow third parties to contact you regarding their products, services, or offers. To withdraw consent, please go to the preferences of the specific third party.
- (d) <u>Research</u>. WalScout may request your consent to use your Personal Data for Research purposes. WalScout may also request your consent to contact you to determine your interest to participate in certain Research initiatives and to share identifying results. For market Research, we may ask questions on behalf of business partners and share your response with business partners.
- (e) <u>Advertising</u>. We may use cookies, pixels (including email pixels), mobile device and advertising IDs, Location Data, app or service usage data and data from sensors for purposes of interest-based and cross-app, cross-device advertising. The consent for which may be managed at the operating system level.
- (f) <u>Transfer of Data</u>. WalScout transfers data to the United States for processing. We may request your consent for this transfer or the transfer, in other cases, may be justified by a legal basis other than consent.
- (g) <u>Automated Processing</u>. WalScout may use some automated processing to provide our Services and to make recommendations in the context of specific Services. This processing is strictly necessary for providing certain Services (and, in some cases, is the service itself) and is not covered by consent. Other automated processing is not significant either due to the nature of the data or the decisions being made or recommended, and so consent is not required. However, for automated processing that is significant and related to sensitive Personal Data, prior to sharing or using such data, WalScout will first seek your consent. For the subset of automated processing included in ad profiling for ad targeting, you can change your consent status (for Website Services) by disabling advertising cookies.
- (h) <u>To Enable Social Sharing and Connect with Us on Social Media</u>. Some of the Services consist of social sharing and communication with others. If you sign up for such Services,

WalScout may ask for your consent to use your information to enable sharing as described in the Service. WalScout may also ask for your consent when you connect with us through a SNS.

(i) <u>Promotions</u>. WalScout may ask you for permission to use your Personal Data for special offers, events, sweepstakes, and other promotions. We may use the Personal Data we collect during promotions, to administer the promotion, verify identity and age, and to communicate with you about the promotion.

#### Internet-Based Advertising

Interest-based advertising is advertising that is targeted to you based on your web browsing and Internet usage over time and across websites. WalScout's advertising practices also include the creation and use of "audience segments". You have the option to restrict the use of information for interest-based advertising and to opt-out of receiving interest-based ads. You may also be asked to consent to our use of cookies, including advertising cookies. Additional information choices for interest-based advertising is found below. For all of the interest-based advertising described, you have the choice to not have your data used to target and serve you interest-based advertising-including third party advertising-regardless of where such ads might be served. These opt-outs require that strictly necessary cookies are not blocked by the settings in your web browser. If you live in the United States, Canada, or the European Union, you can visit Ad Choices (US), Your Ad Choices (Canada), or Your Online Choices (EU) for more information regarding opting-out of interest-based advertising with participating entities for each region. These websites also provide detailed information about how interest-based advertising works. Opting-out does not mean that you will no longer receive advertising from us, or when you use the Internet; rather, it means that the data collected from the Website will not be used for interest-based advertising and that the advertising you see displayed on websites will not be customized to your interests.

Managing Preferences and Withdrawing Consent

You may, at any time, withdraw your consent with future effect and without affecting the lawfulness of processing of your Personal Data based on the consent you provided before you withdrew it, and exercise other controls regarding Website and online data collection, interest-based advertising, your communication settings, and device preferences. Depending on the Services, collection and use of Personal Data may be required for the Services to work. WalScout provides you with several ways to manage your preferences:

- (a) <u>Cookie Use and Controls</u>. Cookies are pieces of data stored in your web browser that are transmitted to websites to remember your browser over time and distinguish it from other users. Cookies are used to remember you and personalize your web experience and for security, analytics, marketing, and interest-based advertising. WalScout's cookies are placed and read by our web servers, while other cookies are placed and read by other companies' web servers. You can block and control cookies using the information noted in this section. If you block all cookies, certain functionality on our website and Services will not work.
- (b) <u>IP Address Use</u>. An IP address is an identifier assigned by a network to a computer, mobile device, or routing device. WalScout's advertising and analytics partners may use IP addresses

to group or correlate devices for purposes of analytics, security and anti-fraud purposes, interest-based advertising, ad targeting, ad attribution, and limiting ad frequency.

- (c) <u>Web Pixels or Beacons</u>. Pixels are extremely small image files that, when loaded by your web browser, cause the browser to make a network request to the party corresponding to the pixel. If that party's cookies are currently stored in your browser, those cookies will be transmitted with the request. Beacons can be used on web pages for advertising or to confirm the opening of a marketing email. When used in conjunction with cookies for interest-based-advertising, the cookie controls above can be used to control the purpose for which they are used.
- (d) <u>HTML5 Local Storage</u>. HTML5 local storage in the browser is different from cookies, but can be used for the same purpose (i.e., to pair a tracking ID to a particular web server with your web browser so that the web server can identify your web browser over time). You can control the purpose for which HTML5 local storage is used by using the cookie controls outlined above and in our browser settings.
- (e) <u>Flash Cookie Use</u>. Flash cookies are "local shared objects" used by Flash player to store data, similar to cookies. If you have Flash installed, and wish to delete, block, or manage Flash cookies, please use the Flash settings panel made available by Adobe.
- (f) <u>Social Networks</u>. Social network widgets, buttons, and plug-ins on our Websites passively transmit data regarding a social network's members to that social network, even when a button is not clicked. These technologies may allow a social network (e.g., Facebook, Twitter or YouTube) to personally identify its members and to know the web pages its members have visited. This is the case where social network buttons are embedded, regardless of whether a button is "clicked", "pressed" or "selected". If you belong to a social network or use these categories of web services, you should review the privacy policies of those services to understand the nature of the data that they collect and what, if any, options the service offers to control how data is collected and used. If you disable advertising cookies, the passive tracking associated with these buttons will be blocked on our sites.
- (g) Mobile Device Advertising ID's, Location and other Data Use. WalScout's Services may transmit Device ID's, Location Data, and data from sensors to us and our partners, including our advertising partners. Device IDs include IDs associated with your mobile device carrier, platform-specific IDs such as Android ID, Google AID, and Apple's IDFA, and IDs that are part of your device hardware, such as WiFi address and serial number. Exactly which Device IDs are transmitted can depend on your mobile device platform and the version of your operating system. WalScout's Services may also collect Device IDs and network addresses (including IP addresses, MAC addresses, and SSIDs) from other, in-range or networked devices and WiFi access points. WalScout may use Device IDs, coarse location and Location Data, and data from sensors, including the local network, for strictly necessary purposes; improving our Services and analytics; personalization and preferences; and cross-app, cross-device, interest-based advertising.

- (h) Withdrawing Consent for Use of Mobile Device ID's, and for Analytics and Advertising. Activating the "Limit Ad Tracking", "Opt out of Ads Personalization", or equivalent setting from your mobile device will transmit a signal to WalScout and any third parties that we use and when that signal is received by WalScout or third parties, it communicates your choice to not have Device IDs used for purposes of advertising or analytics. WalScout honors the signal and requires that our third party advertising and analytics partners do the same.
- (i) <u>Consent Settings for Communication</u>. After signing up for email communications, you can choose to unsubscribe using the unsubscribe link in any commercial email we send. If you use more than one of WalScout's Services, then unsubscribing from the emails relating to that Service may not stop you from receiving emails from other Services. Please note that if you unsubscribe from all emails, then this means that you have unsubscribed from all emails other than strictly necessary emails. You will still receive email communications from us if they are strictly necessary to provide the Services or to confirm or validate a transaction, recover accounts, etc.

#### Transfers of Personal Data to Other Countries

The Personal Data that WalScout processes, and all associated Services and systems, including registration, is housed on servers in the United States. If you are located outside of the United States, then WalScout hereby communicates that Personal Data that WalScout collects will be processed and stored in the United States (the data protection and privacy laws in the United States may offer a lower level of protections than in your country/region). By using WalScout's Services and submitting your Personal Data, you agree to the transfer, storage, and/or processing of your Personal Data in the United States. Where and as required, WalScout will seek your consent as outlined in this Privacy Policy.

# **Data Retention**

WalScout will retain your Personal Data for as long as you maintain a Company account or as otherwise necessary to provide you the Services. WalScout will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where WalScout no longer needs to process your Personal Data for the purposes set out in this Privacy Policy, WalScout will delete your Personal Data from our systems. Where permissible, WalScout will also delete your Personal Data upon your request. If you have questions about WalScout's data retention practices, please contact us at <a href="mailto:info@walscout.com">info@walscout.com</a>. You are free to withdraw your consent for WalScout to process your Personal Data by deleting your Company account by instructing the WalScout support team to do so on your behalf.

# Security

WalScout implements appropriate technical and organizational safeguards to protect against unauthorized or unlawful processing of Personal Data and against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and

transmission of Personal Data. The Services may provide a link or otherwise provide access to Third Party Sites. WalScout provides these links for convenience. WalScout has no control over, does not review, and is not responsible for Third Party Sites, their content, or any goods or services available through the Third Party Sites. Any data, including personal data, collected directly by any Third Party Site is not governed by this Privacy Policy, and any data you provide to Third Party Sites, you provide at your own risk. WalScout strongly encourages you to review the privacy policies of any Third Party Sites with that you interact with. In the event of a breach of the security of your Personal Data, WalScout shall notify you of such breach in accordance with applicable law.

### Children

WalScout does not knowingly collect Personal Data online from children under the age of 13 (note that the minimum age may vary based on country/region, and on local law). If you become aware that a child has provided us with Personal Data without parental consent, please contact us at <a href="mailto:info@walscout.com">info@walscout.com</a>. If WalScout becomes aware that a child under the age of 13 has provided us with Personal Data without parental consent, then the Company will take steps to remove the data and cancel the child's account.

#### Contact Us

If you have any questions, comments, or concerns about how we handle your Personal Data, then you may contact us through our support team or write to us at:

Walscout LLC 30 N Gould St, STE R Sheridan, WY 82801 United States

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