

# Occuspace Privacy Policy

Effective Date: November 1, 2020

Occuspace, Inc. (“Company”, “we”, “us”, “our”) is committed to protecting your personal information and your right to privacy. This Privacy Policy describes how we collect, use, share and protect information in connection with the websites, mobile websites, mobile applications, browser applications, marketing programs, content, related software applications, and Hardware (collectively, the “Service”). This Privacy Policy is incorporated by reference into the Terms of Use.

We take your privacy very seriously. In this Privacy Policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of any Occuspace Service or related property.

## COLLECTION OF INFORMATION

Company receives certain information about you and your devices from our Service Hardware and third-party business partners who collect and provide this information to us. We may then analyze this information to better understand users and the places, spaces, and devices that they interact with. This information does not directly identify you but it may still be considered “personal information” or “personal data” under applicable privacy or data protection laws. The information that we collect falls within the following categories:

- Devices identifiers that include advertising identifiers (“Ad-IDs”) such as iOS IDFAs or Android Ad-IDs; media access control (“MAC”) addresses; router service set identifiers (“SSIDs”); beacon and BLE signal identifiers; and other similar identifiers.
- Internet or other electronic network activity information, including information about app usage, app version and settings, and mobile device and operating system version and settings.
- Geolocation information that includes location derived from GPS and from proximity to WiFi access points.
- Company may also collect additional information that you provide to us if you voluntarily contact us regarding the Service through our website, by email, or over the phone.

Occuspace does not collect information that directly identifies you, such as name, contact information, or government-issued identifier unless you voluntarily or opt-in to provide this information to us.

The information collected and sent through the Service is used to provide the Service’s functionality, fulfill your requests, improve the Service’s quality, engage in research and analysis relating to the Service, personalize your experience, track usage of the Service, provide feedback to third party businesses that are listed or partner with the Service, display relevant advertising, market the Service, provide customer support, message you, back up our systems, allow for disaster recovery, enhance the security of the Service, and comply with legal obligations. Even when we do not retain such information, it still must be transmitted to our servers initially and stored long enough to process.

The personal information that we collect depends on the context of your interactions with the Service, the choices you make, and the products and features you use. We collect, process, and use your information below when you:

- Register for our Service or sign in to an existing account
- Access any Service related software application(s)

- Connect to our Services using third party accounts, such as your email, social media or payment account(s)
- Are in proximity to our Service Hardware and any electronic device you own transmits anonymized or identifiable electronic information or signals
- Contact us for support
- Participate in our social media or influencer programs
- Participate in a sweepstakes, contest, promotion, survey or poll, program, or reward program
- Invite people using the Service
- Post or share content about the Company or Service

Occupyspace and third party service providers may automatically collect information through:

- Interaction with the Company or Service in any way
- Cookies and other tracking technologies
- Location-identifying technologies or location-based services sent by your mobile device or any other device that sends a signal of any type
- Monitoring and analyzing trends, usage and activities
- Device identifiers from any device that transmits or receives a radio frequency signal
- Data analytics such as analyzing anonymized and aggregated data generated by the Service
- Application identifiers
- Session ID and User ID in connection with the Service
- Third party accounts currently or previously connected to the Service
- Mobile device settings and operating information
- Your device settings that allow transmission of electronic signals
- Total amount of time spent in the Services
- Length of Services session

The types of information you provide may include personal information. “Personal information” means information that can be used to identify you (whether alone or in combination). The personal information you may provide to us includes:

- First and last name, email address, telephone number, and other information you may provide to us.
- Unique personal identifier
- Mobile phone number
- Personal and device information from radio frequencies signals sent by any of your devices
- How you connect to our Services, such as your IP address, unique device identifiers, device or session IDs and information regarding the network and connected hardware (e.g., computer or mobile device and carrier), and system configuration information
- Your geolocation, to the extent you have configured your device to permit us to collect such information, date and time stamps associated with transactions, and locale preferences
- Inferences about your preferences, characteristics, behavior and attitudes
- Responses to survey questions regarding the Services
- Information, including usage information, such as frequency of use or average number of minutes for use, generated through use of the Service
- Date and time when interacted with the Service
- Your contacts you connect with the Service
- Third party account information connected to the Service that includes transactions, locations, history, and other data allowed by each third party

## SOCIAL LOGINS

By signing into the Service through a third party social networking service (“Social Networking Service”), such as Facebook or Google, you give us permission to access, store and use any information that you permit the Social Networking Service to share with us in accordance with the privacy settings applicable to your account with that

Social Networking Service. We will use the information we receive only for the purposes that are described in this Privacy Policy or that are otherwise made clear to you in the Service.

## USE OF INFORMATION

We use information we collect to: conduct business and improve the effectiveness of Services; develop new products; provide information and support for the Services; conduct research and analysis including focus groups and surveys; better understand your needs and interests; personalize communications and advertising/offers; promote a quality experience for users of Services; and to perform other business activities related to the Services as needed or as otherwise described in this Policy.

For example, we will use your information to:

- Create and maintain your Occupsace Account(s)
- Communicate, interact and build the Occupsace relationship with you
- Gather transaction statistics relating to your use of Occupsace in order to collect information to measure, analyze and improve the Services
- Manage dispute resolution and perform customer service activities
- Customize the content, products, and features that are offered to you in the Services
- Process, fulfill, and follow up on transactions and requests for products, services, support, and information via the Services
- Engage in market research and analysis
- Comply with legal requirements
- Enforce our agreements
- Deter, detect, and prevent fraud and other prohibited or illegal activities

## SHARING OF INFORMATION

We may share information with Third Parties for the purpose of running the Service and fulfilling our commitments to you. These include businesses that perform services on our behalf, including to help us maintain our products, provide support for legal, security protection, our own marketing, and customer service. Occupsace may share or disclose your information with:

- Third party providers involved in providing the Services
- Third party providers using your information on Occupsace's behalf in connection with signing up for an Occupsace Account
- Third party providers using your information on Occupsace's behalf in connection with connecting a payment method with the Service
- Third party providers using your information to evaluate and enhance the performance of the Services

Occupsace reserves the right to disclose any personal information necessary to protect the rights or safety of any person or entity at its sole discretion.

## PROTECTION OF RIGHTS AND LEGAL MATTERS

Occupsace reserves the right to disclose any personal information necessary to detect or respond to instances of potential or actual fraud or other illegal activities, to respond to a law enforcement agency's request for information or cooperation in an investigation, or to respond to judicial process or other valid government investigation or process, at its sole discretion.

## BUSINESS TRANSFERS

We may share the information we collect, including personal information, with any third party in connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization,

foreclosure or repossession) or any other type of acquisition of all or any portion of Company assets, conveyance or transfer of all or a portion of our business to another company.

## REFERRAL PROGRAMS

Company may offer features that allow you to inform an individual about our Services. If you choose to use our referral features, we will ask for your referral's email address, mobile phone number, social media handle, or other personally identifiable information to send them an electronic communication ("Referral Invite") inviting them to join our Services. Company will store this information for the sole purpose of sending this Referral Invite and tracking the success of our referral program. If you choose to participate in our referral programs, you represent and warrant that you have a personal relationship with your referral and that you are authorized to share their information with Company for the purpose of sending this Referral Invite to join the Services.

If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at [support@occuspace.io](mailto:support@occuspace.io).

## THIRD PARTY DISCLAIMER

The Services contain hyperlinks to websites of merchants, retailers and other websites or locations that we do not control and are operated and controlled by third parties ("Third-Party Websites"). Our Privacy Policy does not apply to these Third-Party Websites and we make no representations regarding the policies or business practices of any such Third-Party Websites. We encourage you to review, and if necessary, adjust, your privacy settings on the applicable Third Party Websites.

## CONTROLLING YOUR PERSONAL DATA

You may in some cases have the option to decline providing us information. However, your choice not to provide information may impact your use of certain features or the capabilities of the Service. You may unsubscribe or opt out of receiving marketing communications from us by using the unsubscribe link on the footer of our marketing emails, reply STOP to text messages, or by contacting [support@occuspace.io](mailto:support@occuspace.io). We encourage you to maintain the accuracy of the information you submit to us, such as the information you provide to register for your Account. The Services may allow you to access, review, correct, update and remove or make inaccessible personal information you have provided through your Account settings. With respect to the Occuspace mobile applications, you can prospectively stop all collection of information by the application by uninstalling the application. You may at any time opt out from further allowing us to have access to your location data by adjusting the permissions in your mobile device. We will make good-faith efforts to make requested changes as soon as reasonably practicable.

## COOKIES AND RELATED TECHNOLOGIES

Occuspace does not track your activities on other mobile apps. Occuspace does not allow third parties that we have agreements with to track your activities across different mobile apps when you use Occuspace. Occuspace may share information with software companies that power your mobile device or app stores and companies that provide tools and information for apps about consumers.

We and our partners use cookies and similar technologies to analyze trends, administer the website, track users' movements around the website and gather demographic information about our user base. We use cookies for many purposes, including, without limitation, authentication and tracking user preferences or web pages visited while using the Services. You may control the use of cookies at the browser level. If you choose to disable cookies, it may limit your use of certain features or functions on the Service.

We, and third parties with which we partner, may also use cookies, pixels and other technologies to automatically collect information about your use of the Services, such as your click-stream data, browsing history, IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. Data collected from a browser or device may be used with another computer or device that is linked to the browser or device on which such data was collected (also known as cross-linking). We may also work with third parties to serve ads to you as part of a customized campaign on other websites or platforms. These third parties may also collect personal information about your online activities over time and across different websites when you use our Services to help predict your preferences and to display (and to enable other third parties to display) ads to be more likely to be of interest to you. Some third party service providers that we engage (including third party advertisers) may also place their own cookies on your browser. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties.

## CHILDREN'S PRIVACY

The Service is intended for general audiences and is not directed to children under 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information without parental consent, please contact us at [support@occuspace.io](mailto:support@occuspace.io). If we become aware that a child under 13 has provided us with personal information without parental consent, we take steps to remove such information and terminate the child's account.

## CALIFORNIA PRIVACY RIGHTS

This section applies only to California Residents. If you live in California and use Occuspace, you have some additional rights when it comes to your data.

## PERSONAL INFORMATION COLLECTED

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), below is a summary of the personal information categories, as identified and defined by the CCPA, that the Company collects, the reason we collect your personal information, where we obtain the personal information, and the third parties that we share your personal information.

For information about the personal information we collect, please refer to the "Collection of Information" section. In relation to the personal information described, the Company collects such information for the business and commercial purposes described in the section "Use of Information". The section "How We Share and Disclose Information" describes the categories of third parties with whom the Company shares such information.

We share information about you with our merchant partners, third parties or affiliates for providing rewards and benefits to you and for marketing purposes. As a result of certain instances of sharing, the Company may receive a benefit, which California law considers a "sale" of personal information.

## PRIVACY RIGHTS

If you are a California resident, you have rights in relation to your personal information.

- You have the right to know the personal information we collect, use, disclose, and sell about you during the preceding 12 months. You may request access to your personal information twice in a 12 month period.
- You have the right to request in writing from us a copy of the:
  - Categories of information we have collected about you
  - The categories of sources from which we collected that information
  - Why we collected that information about you
  - The categories of third parties with whom we shared your personal information

- The categories of personal information that the business disclosed about you for a business purpose
- The specific pieces of personal information we have collected about you.
- You have the right to request that the Company delete any personal information we have collected from you or maintain about you, subject to certain exceptions.

How to exercise your CCPA rights. You may email us with your request and the subject titled "Privacy" at [support@occuspace.io](mailto:support@occuspace.io). If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes. We will confirm receipt of your request, and will provide a response to you within 45 days of your request, though in some exceptional cases it might take longer and if that is the case, we will let you know.

We will not discriminate against you if you exercise your right to know, delete, opt-out of sale, or other CCPA rights. Please note that to the extent you opt-out of Occuspace, some of the functionality and features available to you may change or no longer be available to you upon deletion of your personal information or opt-out of sale of your personal information.

We reserve the right to charge a fee where permitted by law, for instance, if your request is unfounded or excessive. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. In order to designate an authorized agent to make a request on your behalf, you must provide written proof that you have consented to this designation unless the agent has power of attorney pursuant to California Probate Code. You must also verify your identity directly with us by providing a copy of your government issued identification.

## NEVADA PRIVACY RIGHTS

Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. If you decide to opt-out or have any questions regarding our data privacy practices or our compliance with Nevada data privacy law, please contact us at [support@occuspace.io](mailto:support@occuspace.io).

## INFORMATION SECURITY

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. We use safeguards to protect the personal information submitted to us, both during transmission and after we receive it. However, no method of transmission over the Internet or via mobile device, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

## DATA RETENTION

We retain the information collected via our Services until you choose to close your account. After that time, we may aggregate the data and retain it for analytical purposes. We may also retain your information on backup media to comply with applicable law, to support financial audits, to resolve disputes, to maintain compliance efforts and for other legitimate business reasons.

## CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is current as of the effective date set forth above. Company reserves the right to change this Privacy Policy from time to time consistent with applicable privacy laws and principles. If we make changes to this Privacy Policy, we will notify you by revising the date on this Privacy Policy. In some cases, we may provide you with additional notice through the Occuspace Mobile App, statement on the homepages of our Services, or sending you an email notification.

## CONTACT INFORMATION

If you have questions or comments about this Privacy Policy, you may email us at [support@occuspace.io](mailto:support@occuspace.io) or by post to:

Occuspace, Inc.  
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