

## Privacy Policy:

Last Modified: July 31st, 2019

Occuspace Inc. (“**Occuspace**,” “**we**” or “**us**”) is committed to protecting your privacy. This Privacy Policy (“Policy”) explains how we collect, use, and share the personal information we may collect from visitors to our website, mobile apps and Hardware Devices we use for our Services. By accessing or using our Service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

### **Information Collected About You:**

We collect a variety of personal information about users of our products or Services. Personal information is information that can be directly associated with a specific person or entity, such as a name, address, telephone number, email address, or information about activities directly linked to that person.

Our definition of personal information does not include “aggregate” information. Aggregate information is data we collect about a group or category of services or customers from which individual customer identities have been removed. Aggregate data helps us understand trends and customer needs so that we can better consider new services or tailor existing services to customer desires. The aggregate data also might be purchased by or shared with a third party. Here are the types of personal and other information we collect. You should refer to the rest of this Policy to see how we use, disclose, and protect that information:

- Information You Give Us
  - We collect information you give us when you submit an inquiry on our website or use our Services. For example, you may provide us with an email address when requesting information or access to services.
- Automatically Collected Information from Website
  - We automatically receive certain types of information when using our Services, using Google Analytics. When you visit the Occuspace website, our systems automatically collect your IP address, type of browser used, operating system, and time zone.
- Automatically Collected Information from Occuspace Devices
  - When in a Serviced Location that utilizes Occuspace services, our hardware devices may see a MAC address and signal strength indicator from any device that has WiFi or Bluetooth enabled. MAC address information is immediately encrypted on the device and irreversibly hashed after a maximum of two minutes on the device. After hashing, the MAC address is no longer considered personal information and is sent to Occuspace servers for analysis and storage, and deleted off the device.

In a Business Agreement, our customer is a business or other entity purchasing service. In the course of that relationship you may provide us certain personal information.

### **How We Share Personal Information:**

We may share your personal information in the instances described below.

- We may share your personal information with third-party service providers or business partners who help us deliver or improve our service, for example, providers who help us process payments, send email or postal mail, provide back-office services, or measure site traffic. These providers will be given access to your personal information as is reasonably necessary to perform their function under reasonable confidentiality terms.
- We may aggregate, or strip information of personally identifying characteristics, and then share that aggregated or anonymized information with Customers and third-parties.
- We may share or disclose your personal information if we determine, in our sole discretion, that we are required to do so under applicable law or regulatory requirements, or if we reasonably believe disclosure is necessary to prevent harm or financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce our Terms of Use.
- We may share your personal information with corporate subsidiaries we own or control.
- We reserve the right to transfer any information we collect in the event we sell or transfer all or a portion of our business or assets (including any shares in the company) or any portion or combination of our products, services, businesses and/or assets. Should such a transaction occur (whether a divestiture, merger, acquisition, bankruptcy, dissolution, reorganization, liquidation, or similar transaction or proceeding), we will use reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Policy.

### **Customer Data:**

Our Service provides data to Customers which provides our Customers with real-time analytics and tools to create a better experience for their end users and lower carbon emissions for their buildings. Our Service can be used by Customers through a Occuspace or Occuspace mobile app or web portal, or integrated into our Customer's systems such as their own mobile app, website, or other application. When a Customer uses our Service, the Customer's app or website may collect personal information from end users ("Customer Data"). This Customer Data is owned and controlled by our Customers, and any Customer Data that we maintain or process we consider to be strictly confidential. We collect and process Customer Data solely on behalf of our Customers, and in accordance with our agreements with the customers. We do not use or disclose Customer Data except as authorized and required by our customers and provided for in our agreements with our customers.

Please note that this Privacy Policy applies only to the data collection and use practices of Occuspace's website and mobile app, and does not apply to Customer Data or to the data collection practices of our third party Customers that use our Service. It is always a good idea to carefully read the privacy policy of each mobile app you install and use on your mobile device to be sure you understand the app's data collection and use practices.

**Data Collected through the Service.** When going to a Occuspace Customer location that has Occuspace Services enabled, a Occuspace device (small device that uses Bluetooth and WiFi technology to analyze RF signal data in the area) may see the MAC address, signal strength indicator (RSSI), and time stamp of any electronic device in the area that has Bluetooth or WiFi

turned on. As mentioned previously, the MAC address is encrypted during the 2 minute time period it can be on the device before being irreversibly hashed, making it not personally identifiable. That hashed data is then sent to Occuspace servers and deleted off the device. We use this information to better understand how many people are in a room or building throughout the day so our Customers can provide a better service to their employees or customers by letting them know how busy a place is in real-time, optimizing their space utilization, or reducing their GHG emissions. Occuspace devices never collect information such as a name, mobile phone number, email address, or other contact information from our Customer's end users. Occuspace servers never see or store MAC address information, and never make any attempt to connect the data we collect to a specific person. If you do not want the Occuspace beacon to observe your mobile device, you can turn off your device Bluetooth and WiFi.

### **Your Choices Regarding Your Information:**

- **Email Communications.** From time to time, we may send you emails regarding updates to our website, products or services, notices about our organization, or information about products/services we offer (or promotional offers from third-parties) that we think may be of interest to you. If you wish to unsubscribe from such emails, simply click the "unsubscribe link" provided at the bottom of the email communication. Note that you cannot unsubscribe from certain Service-related email communications (e.g., account verification, billing confirmation, technical or legal notices).
- **Modifying Account Information.** If you have an online account with us, you can modify your account information by contacting us at the email address provided below. Please note that Occuspace does not own or control the Customer Data collected through the provision of Service to our Customers, and we cannot modify or delete Customer Data except at the request of our Customer, or as permitted by our Terms of Service

### **Data Protection and Security:**

- **Storage and transfer:** Your information may be stored and processed in the United States or any other country in which Occuspace or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. 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, and you consent to the transfer of information to the U.S. or any other country in which we or our parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.
- **Keeping information safe:** Occuspace cares about the security of your information and uses commercially reasonable physical, technical and organizational measures designed to preserve the integrity and security of all information we collect and that we share with our service providers. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and to notify our Customers if the security, integrity or confidentiality of personal information has been compromised, in accordance with any applicable laws and regulations.

- **California customers:** Point Inside does not disclose customers' personal information to third parties for the third parties' direct marketing purposes, as governed by California Civil Code 1798.83.

Occuspace's obligations with respect Customer Data are defined in our agreements with our customers, including our Terms of Service, and are not included in this Privacy Policy. Each customer will remain responsible for the privacy and security of the Customer Data that it collects and processes and for compliance with applicable data protection laws that may apply to the collection, processing and disclosure of Customer Data.

#### **Links to Third-Party Websites and Services:**

For your convenience, our website and Service may provide links to third-party websites or services that are not governed by this Privacy Policy. To the extent that any linked third-party websites or services you visit are not owned or controlled by Occuspace, we are not responsible for those websites' or services' content or information practices. We encourage you to review the privacy policies of any site or service before providing any personal information.

#### **Children's Privacy:**

Occuspace's website and services are intended for use strictly by adults. We do not knowingly solicit or collect personal information from children under the age of 13. If we learn that any personal information has been collected from a child under 13, we will delete the information as soon as possible. If you believe that we might have collected information from a child under 13, please contact us at [info@occuspace.io](mailto:info@occuspace.io).

#### **Changes to Privacy Policy:**

We reserve the right to change this Privacy Policy from time to time in our sole discretion. We will post changes on this page and indicate the "last modified" date at the top of this page. Please check back often for any updates. Your continued use of our website or services after any change in this Privacy Policy will constitute your acceptance of such change.

#### **Contact Us:**

For additional inquiries about this Privacy Policy, please send us an email at [info@occuspace.io](mailto:info@occuspace.io) or contact us at:

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