

## PRIVACY POLICY

### INTRODUCTION

Havrion, LLC (“**Havrion**,” “**we**,” “**our**” and “**us**”) is concerned about privacy issues and wants you to be familiar with how we collect, use and disclose information. This Privacy Policy (this “**Policy**”) describes the types of information we may collect from you or that you may provide when you download, install, access or use Havrion Protect Suite – Alert/Mobile (our “**App**”) and discusses our practices for collecting, using, maintaining, protecting, correcting, deleting and disclosing that information.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. This Policy applies to any personal information (and, in certain applicable instances, other information) collected on our App. We use the information we collect from you to improve our App and to provide you with a more personalized experience on our App. If you do not agree with our policies and practices, then your choice is not to use our App. By accessing or using our App, you agree to this Policy. This Policy may change from time to time (see **CHANGES TO OUR PRIVACY POLICY**). Your use of our App after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates.

We provide a variety of technology solutions for a variety customers, including, without limitation, schools, businesses, governments and other entities (our “**Customers**”). This Policy does not apply to information we collect from our Customers. For information about how our Customers collect, use, maintain, protect, correct, delete and disclose your information, please refer to the privacy policy of the Customer (i.e. school, business, government or other entity) with whom you are dealing directly.

This Policy does not apply to information we collect through means other than our App, including, without limitation, through our other technology solutions. Our other technology solutions, including, without limitation, our websites have their own privacy policies, which we encourage you to read before providing information on or through them.

### INFORMATION WE COLLECT ABOUT YOU

When we collect information from you, our primary goal is to provide you with an efficient and personalized experience on our App. We collect information about you, including personal information, from the information you voluntarily provide to us, automatic data collection technology when you access and use the App and our affiliates and third parties, including, without limitation, our Customers, who may provide your information to us. Personal information that you may voluntarily provide to us, includes, without limitation, the following:

- name;
- job title;
- e-mail address;
- phone number;
- user name;
- password;
- deployment location that you are assigned by our Customer with whom you are dealing directly; and
- location data within the geolocation fenced area that is assigned by our Customer with whom you are dealing directly.

When you access and use the App, we may automatically collect certain details of your access to and use of the App. Information that we collect through automatic data collection technology includes, without limitation, information about your device, internet connection, location data and internet protocol (“IP”) address, operating system, browser type, mobile network information, and the device’s telephone number. When you access and use the App, we may automatically collect certain details of your access to and use of the App.

The App collects real-time information about the location of your device within the geolocation fenced area that is assigned by our Customer with whom you are dealing directly.

If you submit any personal information relating to other people to us in connection with our App, then you represent and warrant that you have the authority to do so and to permit us to use the information in accordance with this Policy.

If you do not want us to collect this information, then do not download, install, use or access the App or delete it from your device. Note that opting out of the App’s collection of location information will disable its location-based features.

## **HOW WE MAY COLLECT YOUR INFORMATION**

We may collect information in several ways, including:

- **Directly from you:** If you contact us, then we may collect information, including personal information, through records and copies of your correspondence with us. We may also collect information, including personal information, when you respond to our questions via e-mail or feedback forms. If we collect information directly from you, then you may have the option to refuse to provide us with such information. However, if you decline to provide us information, then this may impact your ability to use our App.
- **Offline:** You may provide information, including personal information, to us when you contact an App representative.
- **Through tokens:** A software token is a piece of a two-factor authentication security device that may be used to authorize the use of computer services. Software tokens are stored on a general-purpose electronic device, such as a desktop computer, laptop, PDA, or mobile

phone, and can be duplicated. Software tokens allow our App to serve the user with specific information tied to the user (such as name and e-mail address, as well as our Customer's account identification) and help facilitate a quick and automatic authentication when accessing and using our App.

- **From our affiliates and third parties:** We may receive information, including personal information, from our affiliates and third parties, including, without limitation, our Customers, who may provide your information to us. For information about how our Customers collect, use, maintain, protect, correct, delete and disclose your information, please refer to the privacy policy of the Customer (i.e. school, business, government or other entity) with whom you are dealing directly.
- **Automatically:** The App collects real-time information about the location of your device within the geolocation fenced area that is assigned by our Customer with whom you are dealing directly.

We will rely on consent, which in some cases may be implied, to use technical information that is collected through our App. You may withdraw such consent at any time by contacting us as described in this Policy. When we obtain personal information through a third party, including, without limitation, our Customers, such third party supplying such personal information is responsible for the management of consent, where required.

The information we collect automatically is statistical data and may, depending on applicable law, include personal information, and we may maintain it or associate it with personal information we collect in other ways or receive from our affiliates or third parties, including, without limitation, our Customers. It helps us to improve our App by enabling us to, among other things, recognize you when you return to our App and store information about your preferences.

## **HOW WE MAY USE YOUR INFORMATION**

To the extent permitted by applicable law, we may use information, including personal information, that we collect:

- to accomplish the actions or transactions you initiate through the App;
- to respond to and act upon App support inquiries and requests;
- to fulfill our obligations to our Customers;
- to improve our existing, or develop new, services;
- to notify you of any specials, new products or services, or changes to this Policy;
- to supply information to you upon your request;
- to present our App and its contents to you in a fashion customized to match your preferences;
- to personalize your experience on our App;
- to help facilitate a quick and automatic authentication when you access and use our App;
- to allow you to use location-based functionality on our App;
- to allow you to participate in interactive features on our App;

- to support our business such as App support, data analysis, IT services, customer service and other services;
- to carry out obligations and enforce our rights arising from any contract entered into between you and us;
- to pursue our legitimate interests;
- to comply with legal process;
- to respond to request from public and government authorities;
- to enforce or apply our terms of use [www.havrion.com/terms-and-conditions](http://www.havrion.com/terms-and-conditions) and other agreements that we may have with you;
- to allow us to pursue available remedies or limit the damages that we sustain;
- to protect our operations or those of any of our affiliates; and
- to protect our rights, privacy, safety or property, and that of our affiliates, you or others.

### **DISCLOSURE OF YOUR PERSONAL INFORMATION**

To the extent permitted by applicable law, your personal information may be disclosed:

- to our affiliates for the purposes described in this Policy and to support our business such as App support, data analysis, IT services, customer service and other services;
- to contractors, service providers, and other third parties who we use to support our business such as App support, data analysis, IT services, customer service and other services;
- to any third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of any or all portion of our business, assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding;
- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of use [www.havrion.com/terms-and-conditions](http://www.havrion.com/terms-and-conditions) and other agreements that we may have with you;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our affiliates or others;
- with your consent; and
- for any other purpose disclosed by us when you provide the information.

We will not disclose or sell any personal information to any unaffiliated third party for direct marketing purposes without your consent.

### **THIRD PARTY WEBSITES**

Our App contains links to various third party websites to, among other things, support our business such as App support, data analysis, IT services, customer service and other services. These third party websites may collect personal information. This Policy does not address, and we are not responsible for, the privacy, information or other practices of any third party, including any third

party operating any site to which our App contains a link. The inclusion of a link on our App does not imply endorsement of the linked site by us or any of our affiliates.

## **CHOICES AND ACCESS**

We strive to provide you with choices regarding our use and disclosure of your personal information. We have created mechanisms to provide you with the following control over your personal information:

- If at any time you wish to stop receiving communication from us, please just let us know by contacting us via our email address or phone number listed below (see **CONTACT INFORMATION**).
- If you block the use of location information, some parts of the App may become inaccessible or not function properly.

To review, correct, update, delete or otherwise limit our use of your personal information (such as behavioral tracking), please contact us using the email address or phone number listed below (see **CONTACT INFORMATION**).

## **SECURITY**

When users submit sensitive information via our App, their information is protected both online and offline. Prevention of unauthorized access or disclosure of data is of the utmost importance. Physical, administrative and technical procedures are employed to safeguard all collected information.

All data transactions between you and us through our App occurring over a public network (i.e. the Internet) are encrypted using SSL technology. Specific certifier details can be inspected in your browser during a secure session (see browser-specific help for details).

Access to personal information and data by our employees is limited to those persons or agents of our company that have a specific business purpose for maintaining and processing such personal information. These individuals are made aware of their responsibilities to protect the security of that personal information and uphold the principles of confidentiality and integrity.

The safety and security of information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. Please do not share your password with anyone. Sharing of account passwords is considered an acceptable use violation and may result in loss of access to our App.

Unfortunately, new vulnerabilities arise in the realm of technology every day. Although we strive to protect your information, circumstances beyond our control may compromise that goal and, accordingly, we cannot guarantee the absolute security of your information. As with any

application, please be conscious of the data you share. If you are not comfortable providing any information, then it is your right to withhold it.

IN NO EVENT SHALL WE BE LIABLE FOR ANY DAMAGES (WHETHER CONSEQUENTIAL, DIRECT, INCIDENTAL, INDIRECT, PUNITIVE, SPECIAL OR OTHERWISE) ARISING OUT OF, OR IN ANY WAY CONNECTED WITH, A THIRD PARTY'S UNAUTHORIZED ACCESS TO YOUR INFORMATION, REGARDLESS OF WHETHER SUCH DAMAGES ARE BASED ON CONTRACT, STRICT LIABILITY, TORT OR OTHER THEORIES OF LIABILITY, AND ALSO REGARDLESS OF WHETHER WE ARE GIVEN ACTUAL OR CONSTRUCTIVE NOTICE THAT DAMAGES WERE POSSIBLE, EXCEPT AS PROVIDED UNDER APPLICABLE LAWS.

### **RETENTION PERIOD**

We may retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation.

### **CHANGES TO OUR PRIVACY POLICY**

If we decide to change this Policy, then we will post any changes we make or a new privacy policy on this page with a notice that the Policy has been updated and notify you with an in-App alert the first time you use the App after we make the change. Any changes to this Policy will become effective when we post the revised Policy. The effective date for this Policy is identified at the top of this Policy. You are responsible for periodically visiting our App and this Policy to check for any changes. Your use of our App following these changes means that you accept the revised Policy.

### **CHILDREN UNDER THE AGE OF 13**

Our App is not intended for children under 13 years of age and we do not knowingly collect personal information from children under 13 years of age. In the event that we learn that we have collected personal information from a child under 13 years of age, we will delete such personal information as soon as possible. Visit the Federal Trade Commission website for more information about the Children's Online Privacy Protection Act.

### **CALIFORNIA PRIVACY RIGHTS**

Currently, we do not disclose any personal information to third parties for direct marketing purposes. However, pursuant to Section 1798.83 of the California Civil Code, residents of California can obtain certain information about the types of personal information that companies

with whom they have an established business relationship have shared with third parties for direct marketing purposes during the preceding calendar year. In particular, the law provides that companies must inform consumers about the categories of personal information that have been shared with third parties, the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties.

### **CONTACT INFORMATION**

It is likely that we will not interact directly with you and that we may do so only at our Customer's direction. If you have any questions, comments or concerns about this Policy, your information or other privacy-related matters, then please first contact the Customer (i.e. school, business, government or other entity) with whom you are dealing directly. We will work with our Customer to address any such any questions, comments or concerns within a reasonable timeframe, but we may not interact directly with you.

If you desire to contact us directly regarding any questions, comments or concerns that you may have about this Policy, your information or other privacy-related matters, then you may contact us in the following ways:

Mailing Address:      Havrion, LLC  
                                 Attention: Havrion Legal Dept.  
                                 2900 Monarch Lakes Blvd. Suite# 304  
                                 Miramar, FL 330274

Email Address:        legal@havrion.com

### **USERS FROM THE EUROPEAN UNION AND SWITZERLAND**

This section of this Policy applies to users of our App from a Member State of the European Union or Switzerland, and supplements the other information in this Policy.

To the extent that Havrion is subject to the laws of the European Union when processing personal data ("**Personal Data**"), it shall be the data controller under such laws.

### **LAWFULNESS OF PROCESSING**

Our legal basis for processing your Personal Data is that such processing is necessary for the purposes of the legitimate interests pursued by us. In some instances, your consent may be required for the processing of your Personal Data for one of the purposes set out in this Policy.

## **CROSS-BORDER TRANSFER**

When Personal Data is transferred out of the country where the owner of that Personal Data lives, such as from citizens of the European Union and Switzerland to the United States of America, different standards may apply to how your Personal Data is used and protected in those countries. We have safeguards in place in accordance with applicable legal requirements, including, without limitation, obtaining written assurances from any third party given access to your Personal Data so as to require them to adopt standards that ensure an equivalent level of protection for Personal Data as that adopted by Havrion. If you prefer not to have your Personal Data transferred, then do not download, install, access or use our App.

## **YOUR RIGHTS**

If you are in the European Union or Switzerland, then you also have the right to request access to, rectify, or erase your Personal Data. You also have a right to the objection to or restriction of processing, as well as the right to data portability, when applicable. If Havrion has processed your Personal Data based on your consent, then you have a right to withdraw it at any time. When we receive a request from you to exercise one of these rights, we will respond to your request as quickly as possible, and, in any event, in accordance with applicable legal requirements.

## **SUMMARY**

We are concerned about privacy issues and committed to protecting your privacy and information. We use the information we collect to provide you with an efficient and personalized experience on our App.

If you have any questions, comments or concerns about this Policy or other privacy-related matters, then please contact us via our email address or phone number listed above (see **CONTACT INFORMATION**).