

RoadSync

Privacy Policy

*****PLEASE READ CAREFULLY*****

Last modified: **May 15, 2018**

RoadSync, Inc. (“*Company*”, “*Company*”, “*we*”, “*us*” or “*our*”) respect Your privacy and are committed to protecting it through our compliance with this policy (the “*Privacy Policy*”).

This policy describes the types of information we may collect from you or that you may provide when You use the Company’s RoadSync mobile software application (the “*Company Services*”), or use the www.roadsync.com website (the “*Website*”), software accessible to you via the website (the “*Software*”), or interact with services, features, functionality, content, websites, or products offered by Company through the Company Services or Software (collectively, with the Company Services, Website and Software, the “*Company Services*”), and our practices for collecting, using, maintaining, protecting and disclosing that information. The Company Terms of Use (the “*Terms of Use*”) are expressly incorporated herein by reference and are an integral part hereof. The Terms of Use can be found here: <https://roadsync.com/terms-of-service/>.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. **IF YOU DO NOT WANT TO AGREE TO OUR PRIVACY POLICY, YOU MUST NOT SIGN UP, DOWNLOAD, OR REGISTER FOR, ACCESS OR USE THE SOFTWARE.**

1. Changes to this Privacy Policy.

We reserve the exclusive right to make changes to this Privacy Policy from time to time. Your continued access to and use of the Company Services and any associated services constitutes your agreement to be bound by, and your acceptance of, the Privacy Policy posted at such time. You acknowledge and agree that you accept this Privacy Policy (and any amendments thereto) each

time you use the Company Services or sign into your account. Therefore, we encourage you to review this Privacy Policy regularly.

If, within thirty (30) days of us posting changes or amendments to this Privacy Policy, you decide that you do not agree to the updated terms, you may withdraw your acceptance to the amended terms by providing us with written notice of withdrawal of your acceptance. Upon providing us with your notice of your acceptance withdrawal, you are no longer authorized to access or use the Company Services or any associated services, and you must not do so.

2. Children Under The Age Of 13.

Our Company Services are not intended for children under 13 years of age. No one under age 13 may provide any information within the Company Services. We do not knowingly collect Personal Information (as defined below) from children under 13. If you are under 13, do not use or provide any information using Company Services or on or through any of its features; register on any of the Company Services; make any purchases or conduct any transactions through the Company Services; use any of the interactive or public comment features of the Company Services; or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at info@roadsync.com.

3. Applicability.

a. This Privacy Policy applies to:

- i. Information we collect through Company Services and in email, text, and other electronic communications sent through Company Services;
- ii. Information or data that you input or upload through Company Services; and
- iii. In your interactions with us through the Company Services.

b. This Privacy Policy does not apply to:

- i. Information collected by us offline or through any other means, including on any other website or application operated by us or any third party (including our affiliates and subsidiaries);
- ii. Information collected by any third party services that may link to or be accessible from or on the Company Services; or
- iii. Information you provide to any third parties.

4. Information We Collect About You and From You.

We collect several types of information from and about users of our Company Services including:

- a. **Non-Personal Information:** From Users of the Company Services ("**End Users**"): Information that is about you, but individually does not identify you, such as your IP address; domain server; internet browser; equipment; devices used to access the Company Services; and Company Services usage details ("**Non-Personal Information**");
- b. **Personal Information:** Information by which you may be personally identified, if you provide it to us, such as your name; postal address(es) (street number, city, state, zip code, country); e-mail address; telephone number; payment information (e.g., credit card number); and any other identifier by which you may be contacted online or offline ("**Personal Information**"); and
- c. **Aggregate Information:** Information that may be derived from Personal Information, but that is combined, stored, and presented in manner that does not identify you or any other user of the Company Services individually ("**Aggregated Information**").

5. How We Collect Information From You or About You.

- a. **We collect this information:**
 - i. Directly from you when you provide it to us, including when you input information into your Account;
 - ii. Automatically as you navigate through the Company Services. Information collected automatically may include usage details; contents of an e-mail or direct message sent

through the Company Services; IP addresses and information collected through cookies; web beacons; and other tracking technologies;

- iii. From third parties, for example, our partners or outside parties who provide services to you through or via the Company Services.

b. Information You Provide to Us. The information we collect on or through our Company Services may include:

- i. Information that you provide by filling in forms on our Company Services. This includes information provided at the time of registering to use our Company Services, purchasing any products via the Company Services, subscribing to any services, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Company Services;
- ii. Text, photographs, videos, sound recordings, and any other multi-media content that you may upload to the Company Services or to which you grant the Company Services with access;
- iii. Records and copies of your correspondence (including e-mail addresses), if you contact us;
- iv. Your responses to surveys that we might ask you to complete for research purposes;
- v. Details of transactions you carry out through our Company Services. You may be required to provide financial information before placing an order through our Company Services;
- vi. Contents of an e-mail or direct message sent through the Company Services;
- vii. Your search queries through Company Services; and
- viii. Certain information (including Aggregated Information) or data collected about your use of the Company Services or regarding a category of products, services, or users.

c. Information You Publically Post to the Company Services. You also may provide information to be published or displayed (hereinafter, “*posted*”) on public areas of the Company Services (the “*User Contributions*”). You may keep your User Contributions anonymous to other users of the Company Services simply by not posting information that identifies you. You acknowledge and agree, however, that when you post or transmit your User Contributions through the Company Services, you do so at your own risk.

Additionally, we cannot control the actions of other users of the Company Services with whom you may choose to interact with or share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

- d. Automatic Information Collection and Tracking.** As you navigate through and interact with our Company Services and other Users, we may use automatic data collection technologies to collect certain information about your computer equipment, browsing actions and patterns, including:
- i. **Usage Details.** When you access and use the Company Services, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the Company Services.
 - ii. **Device Information.** We may collect information about your 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.
 - iii. **Stored Information and Files.** The Company Services also may access metadata and other information associated with other files on your device, if you grant access to such files and information to the Company Services. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
 - iv. **Location Information.** This Company Services collects real-time information about the location of your device.
- e. Automatically Collected Personal Information.** The information we collect automatically is statistical data and may include Personal Information, or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Company Services and to deliver a better and more personalized service, including by enabling us to:
- i. Estimate our audience size and usage patterns;

- ii. Store information about your preferences, allowing us to customize our Company Services according to your individual interests;
- iii. Speed up your searches; and
- iv. Recognize you when you return to our Company Services.

f. Technologies Used By Us. The technologies we use for this automatic data collection may include:

- i. **Cookies (or mobile cookies).** A cookie is a small file placed on your computing device. You may refuse to accept browser cookies by activating the appropriate setting on your device. However, if you select this setting you may be unable to access certain parts of our Company Services. Unless you have adjusted your device setting so that it will refuse cookies, our system will issue cookies when you access the Company Services.
- ii. **Web Beacons.** Certain aspects of the Company Services 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 us, for example, to count users who have visited certain pages or areas of the Company Services or opened an e-mail and for other related Company Services statistics (for example, recording the popularity of certain Company Services content and verifying system and server integrity).

6. Third-party Use of Cookies and Other Tracking Technologies.

- a. Some content or applications, including advertisements, on the Company Services are served by third parties, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Company Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different Company Services and other online services.
- b. 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.

7. How We Use Your Information.

- a.** We use information that we collect about you or that you provide to us, including any Personal Information:
 - i. To present Company Services and their contents to you;
 - ii. To provide you with information, products or services that you request from us;
 - iii. To provide you with notices about your Account;
 - iv. To improve our Company Services or any products or services we offer or provide through it;
 - v. To facilitate transactions you are involved in as a User;
 - vi. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
 - vii. To notify you about changes to our Company Services or any products or services we offer or provide through it;
 - viii. To allow you to participate in interactive features on our Company Services;
 - ix. In any other way we may describe when you provide the information;
 - x. To fulfill any other purpose for which you provide it; and
 - xi. For any other purpose with your consent.

- b.** We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you.

- c.** We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

- d.** We may use the information we have collected from you for general commercial purposes. For example we may use collected information for review of Company Services function and efficiency.

8. Disclosure of Your Information.

- a. We may disclose Aggregated Information about our users and information that does not identify any individual, without restriction.
- b. We may disclose Personal Information that we collect or you provide as described in this Privacy Policy:
 - i. To our subsidiaries and affiliates for the purpose of making the Company Services available to you and to provide associated services to you;
 - ii. To 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;
 - iii. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Company about our Company Services users is among the assets transferred;
 - iv. To third parties to market their products or services to you if you have not opted out of these disclosures. We contractually require these third parties to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
 - v. To fulfill the purpose for which you provide it. For example, if you use our Company Services to send a direct message, we will transmit the contents of that direct message and your name to the recipient;
 - vi. For any other purpose disclosed by us when you provide the information; and
 - vii. For any other purpose with your consent.

- c. We may also disclose your Personal Information:
 - i. To comply with any court order, law or legal process, including responding to any government or regulatory request;
 - ii. To enforce or apply our Terms of Use as well as other agreements, including for billing and collection purposes;
 - iii. To protect us and other users of the Company Services where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of this Privacy Policy, or as evidence in litigation in which we are involved; and
 - iv. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

9. Choices About How We Use and Disclose Your Information.

- a. We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:
 - i. **Tracking Technologies and Advertising.** You can set your computing device to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Company Services may then be inaccessible or not function properly.
 - ii. **Location Information.** You can choose whether or not to allow the Company Services to collect and use real-time information about the location of your computing device through the device's location and/or privacy settings. If you block the use of location information, some parts of the Company Services may then be inaccessible or not function properly.

- iii. **Promotional Offers from the Us.** If you do not wish to have your e-mail address used by the us to promote our own or third parties' products or services, you can opt-out by clicking the “unsubscribe” link contained in these emails; checking the relevant box on the Registration Form; or by logging into the Company Services and adjusting your user preferences in your account profile. If we have sent you a promotional e-mail, you may send us a return e-mail asking to be omitted from future e-mail distributions. Please note that it may take up to 10 business days for us to process opt-out requests. This opt out does not apply to information provided to us as a result of a product purchase or other transactions conducted by you via the Company Services.

- b. If you access any links to third party websites available to you via the Company Services or utilize any services through the Company Services that are provided by third parties (including, without limitation, any social media tools, plugins, or widgets), you will be subject to such the policies of those third parties. We do not control third parties’ collection or use of your information (including information related to interest-based advertising), and we are, therefore, not responsible for the content or privacy practices of third parties (or of any websites or applications provided by third parties). Individual third parties may, however, provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“*NAI*”) on [NAI's Application](#).

10. Accessing and Correcting Your Information.

- a. You can review and change your Personal Information by logging into the Company Services and visiting your account profile page.

- b. You may also send us an e-mail at info@roadsync.com to request access to, correct or delete any Personal Information that you have provided to us. We cannot delete your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

- c. If you delete your User Contributions from the Company Services, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Company Services users. Proper access and use of information provided on the Company Services, including User Contributions, is governed by our [Terms of Use](#).

11. Third-Party Analytics. We also use automated devices and applications, such as, for example, Google Analytics or Mixpanel to evaluate usage of the Company Services, and the services we provide; you can opt out of these tools as follows: [Google Analytics](#) and [Mixpanel](#). We use these tools to gather non-personal information about our users to help us improve our services, performance and user experiences. These analytics providers may use cookies and other technologies to perform their services, and may combine the information that they collect about you on the Company Services with other information that they have collected. This Privacy Policy does not cover such third parties' use of the data.

12. Your California Privacy Rights.

California Civil Code Section § 1798.83 permits users of our Company Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to info@roadsync.com.

13. Data Security.

We have implemented reasonable security measures designed to protect your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. Data and records regarding your registration with and use of the Company Services will be retained for a reasonable period of time. All information you provide to us is stored in an encrypted format on and hosted on secure servers. These facilities may be operated by us or by our third-party service providers. By using the Company Services, you consent to having your Personal Information stored, transferred, and processed by these facilities. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Company 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 in public areas of the Company Services like message boards. The information you share in public areas may be viewed by any user of the Company Services.

Unfortunately, the transmission of information via the Company Services and computing devices is not completely secure. Although we strive to protect your personal information, we cannot guarantee the security of your personal information transmitted on our Company 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 Company Services.

14. Contact Information.

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at: info@roadsync.com.