### SEKURETRAK INC.

## **ONLINE PRIVACY POLICY**

Last modified: September 30, 2017

## 1. INTRODUCTION

**Purpose.** The purpose of this Privacy Policy is to describe how SekureTrak Inc. ("Company") collects, uses and shares information about you through our U.S. online interfaces (e.g., websites and mobile applications) owned and controlled by us, including <a href="https://www.traknprotect.com">www.traknprotect.com</a> (collectively referred to herein as the "Site"). Please read this notice carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to <a href="https://company.com/Contact Us">Contact Us</a> or email or call us as described at the end of this Policy.

Our Privacy Policy explains:

Information We Collect and Why We Collect It

How We Use and Share Your Information

Access to Your Information and Choices

Security of Your Information

California Privacy Rights

**International Privacy Practices** 

Changes to Our Privacy Policy

Questions and How Contact Us

**Scope; Third Party Sites.** This Privacy Policy applies only to information we collect at and through the Site. Our Site also contains links to third party sites that are not owned or controlled by Company. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every website that collects personal information.

**Terms of Use.** Please note that your use of our Site is also subject to our <u>Terms of Use</u>.

## 2. INFORMATION WE COLLECT AND WHY WE COLLECT IT

Information You Provide To Us.

Types of personal information we collect when you provide it to us include:

- Name
- Address

- Billing address
- Shipping address
- Email address
- Telephone number
- Credit or debit card number (solely for payment purposes)

**Information We Collect Automatically.** We collect certain information automatically as you use our Site and products, such as

- IP address
- Browser type
- Computer or device type
- Unique device identifiers
- Operating system version
- The website from where you navigated to our Site
- Time and date of using our Site
- The pages on our Site that you view
- The name of your Internet service provider (ISP)
- Location / Geolocation information

## **Information Collected Through Google Analytics.**

We use Google Analytics, a web analytics service provided by Google, Inc. ("Google") to collect certain information relating to your use of the Site. Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out

above. For more information regarding Google Analytics please visit Google's website, and pages that describe Google Analytics, such as <a href="https://www.google.com/analytics/learn/privacy.html">www.google.com/analytics/learn/privacy.html</a>.

# Information Collected Through Cookies and Similar Technologies.

We and our service providers use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our website through your computer or mobile device. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store unique identifiers, user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. We use cookies to improve the quality of our service, including for storing user preferences, tracking user trends and providing relevant advertising to you.

# No Information From Children Under Age 13.

If you are under the age of 13, please do not attempt to register with us at this Site or provide any personal information about yourself to us. If we learn that we have collected personal information from a child under the age of 13, we will promptly delete that information. If you believe we have collected personal information from a child under the age of 13, please Contact Us or call us at (312) 528-7067.

### 3. HOW WE USE AND SHARE YOUR INFORMATION

To Provide Products, Services, and Information. As described above, we collect information from you so that we can provide products and services that you purchase at the Site, and provide information that you request from us. We use your personal information to contact you about your orders, process credit card / debit card transactions, and ship products to you. We may send you information about our products and services, and new offerings. We may provide information to third party service providers that help us process orders, and fulfill and deliver products and services that you purchase from us.

We may use third parties to help host our Site, send out email updates about the Site, provide marketing and advertising services for us, remove repetitive information from our user lists, and process payments. These service providers will have access to your personal information in order to provide these services, but when this occurs we implement reasonable contractual and technical protections to limit their use of that information to helping us provide the service

**Your Consent.** In addition to the sharing described elsewhere in this Policy, we will share personal information and geolocation information related to products that you purchase from us with companies, organizations or individuals outside of the Company when we have your consent to do so. With respect to geolocation information related to products that you

purchase from us, you may consent to varying levels of disclosure of such information to designated third parties, including: McLaren Technologies, VM Presence and American Hotel Register.

**Legal Proceedings.** We will share personal information with third party companies, organizations or individuals outside of Company if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, subpoena, legal process or governmental request.
  - Enforce applicable Terms of Use, including investigation of potential violations.
  - Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of Company, our users, customers or the public as required or permitted by law.

**Transfer in the Event of Sale or Change of Control.** If the ownership of all or substantially all of our business changes or we otherwise transfer assets relating to our business or the Site to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, we may transfer or sell your personal information to the new owner. In such a case, unless permitted otherwise by applicable law, your information would remain subject to the promises made in the applicable privacy policy unless you agree differently.

### 4. ACCESS TO YOUR INFORMATION AND CHOICES

If you have questions about personal information we have about you or need to update your information, you can <u>Contact Us</u> or call us at (312) 528-7067. You can opt-out of receiving marketing and promotional e-mails from Company by using the opt-out or unsubscribe feature contained in the e-mails

You can close your online account by emailing us at <a href="notices@traknprotect.com">notices@traknprotect.com</a>. If you close your account, we will no longer use your online account information or share it with third parties. We may, however, retain a copy of the information for archival purposes, and to avoid identity theft or fraud.

# 5. SECURITY OF YOUR INFORMATION

We use industry standard physical, technical and administrative security measures and safeguards to protect the confidentiality and security of your personal information. However, since the Internet is not a 100% secure environment, we cannot guarantee, ensure, or warrant the security of any information you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login information. Please note that e-mails and other communications you send to us through our Site are not

encrypted, and we strongly advise you not to communicate any confidential information through these means.

## 6. INTERNATIONAL PRIVACY PRACTICES

Our Site is operated and managed on servers located and operated within the United States. By using and accessing our Sites, residents and citizens of countries and jurisdictions outside of the United States agree and consent to the transfer to and processing of personal information on servers located in the United States, and that the protection of such information may be different than required under the laws of your residence or location.

### 7. CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your consent in accordance with applicable law. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review. **QUESTIONS AND HOW CONTACT US** 

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, please <u>Contact Us</u> or email us at notices@traknprotect.com call us at (312) 528-7067, or contact us by US postal mail at the following address:

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Suite 320

Chicago, IL

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