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Privacy Policy

Scope

Your privacy is important to Algotive, which is why we have developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your information, both personal and data not related to you but entered by you when using our Products and Services.

Algotive collects data through interactions between you and our Products and Services. You provide some of this data directly and we obtain others by collecting data about your interactions, your use and your experiences with our Products and Services. The data we collect depends on the context of your interactions with Algotive and the choices you make, including those regarding your privacy settings, as well as the Products and Services and features you use.

You have choices about the technology you use and the data you share. When you are asked to provide personal data, you can refuse to do so. Many of our Products and Services require some personal data in order to provide you with a service. If you choose not to provide the data required to provide you with a Product or feature, you may not use such Products or feature. Similarly, when we need to collect personal data by legal imperative, to enter into a contract with you or to perform it and you do not provide the data, we will not be able to enter into the contract; or, if this is related to an existing Product you are using, we may need to suspend or cancel it. In due course, we will notify you when this is the case. Where providing the data is optional and you choose not to share personal data, features that use such data, such as personalization, will not work for you.

To process the data, we rely on various legal reasons and permissions, among which are your consent, weighted legitimate interests, the need to enter into and execute contracts and compliance with legal obligations, for various purposes described below.

We also obtain data from third parties and protect such data obtained in accordance with the procedures described in this statement and the additional restrictions imposed by the origin of the data. These third-party sources vary over time and include:

• Data agents from whom we purchase demographic data to supplement the data we collect.

• Services that make user-generated content on their service available to others, such as comments from local businesses or social media posts.

• Communication services, including email providers and social networks, when you grant us permission to access your data on such third-party services or networks.

• Service providers who help us determine the location of your device.

- Partners with whom we offer shared services or engage in joint marketing activities.
- Developers who create our Algotive Products and Services.
- Others with publicly available sources, such as open public, academic, and commercial datasets, among others.

Collection and Use of Personal Information

Personal information is data that can be used to identify or contact a single person. You may be required to provide your personal information each time you contact Algotive or an Algotive affiliated company. Algotive and its affiliates may share this personal information with each other and use it in accordance with this Privacy Policy. They may also combine it with other information to provide and improve our Products and Services, content and advertising. You are not required to provide the personal information we have requested from you, but, if you choose not to do so, in many cases we will not be able to provide you with our Products and Services or respond to any inquiries you may have.

Below are some examples of the types of personal information Algotive may collect and how we may use it.

What personal information we collect

When you create an Algotive Account, purchase a Product or Service, download a software update, connect to our services, communicate with us including through social media, or participate in an online survey, we may collect a variety of information, including the data we collect may include:

- Name and contact details. Your first and last name, email address, postal address, telephone number and other similar contact details.
- Credentials. Passwords, password hints, and similar security information used for authentication and account access.
- Demographic data. Data about you, such as your age, gender, country or region, and preferred language.

• Payment details. Data for processing payments, such as your payment instrument number (for example, a credit card number) and the security code associated with your payment instrument.

• Subscription and license data. Information about your subscriptions, licenses, and other rights.

• Interactions. Data about the use of Algotive Products and Services. In some cases, such as search queries, this is data that you provide in order to make use of the Products and Services. In other cases, such as with error reports, this is data that we generate. Other examples of interaction data include:

a. **Device and usage data**. Data about your device and the Product and features you use, including information about the hardware and software, and how our Products and Services work, as well as their configuration. For example:

- **Payment History and Algotive Account**. Data about the Products and Services you purchase, and the activities associated with your Algotive Account.
- **Browsing history**. Data about the web pages you visit.
- Device data, connectivity, and configuration. Data about your device, your device settings, and nearby networks. For example, data about operating systems and other software installed on your device, including Product keys in addition, the IP address, device identifiers (such as imEl number for phones), regional and language settings, and information about WLAN access points near your device.
- Error reports and performance data. Data about the performance of the Products and Services and any problems you
 experience, including error reports. Error reports (sometimes referred to as "memory dumps") may include details of
 the software or hardware related to an error, the contents of files opened when an error occurs, and data about other
 software on the device.
- Troubleshooting and help data. Data you provide when contacting Algotive for help, such as the Products and Services you use and other details that help us provide technical support. For example, contact or authentication data, the content of chats and other communications with Algotive, data about the status of the device and the Products and Services you use in connection with the help query. When you contact us, such as for technical support, phone conversations or chat sessions with our representatives may be monitored or recorded.
- Bot usage data. Interactions with third-party bots and skills available through Algotive Products and Services.
- b. **Searches and commands**. Search queries and commands when you use Algotive Products and Services with related search or productivity functionality.
- c. **Text, inking, and typing data**. Text, inking, typing data, and related information. For example, when we collect inking data, we collect information about the location of the device's inking instrument.
- d. Imagery. Images and related information, such as image metadata.
- e. **Contacts and relationships**. Data about your contacts and relationships, whether you use a Product to share information with others, manage contacts, communicate with others, or improve your productivity.

f. Location data. Data about the location of your device, which may be accurate or inaccurate. For example, we collect location data using global navigation satellite systems (GNSS) (e.g. GPS) and data on mobile phone towers and wi-fi zones in the vicinity. Location may also be deduced from the IP address or access data to your Algotive Account that indicates where you are located less accurately, for example, at the city or zip code level.

Another entry. Other inputs that are provided when using our Products and Services. For example, manipulation or system access data from a VDRD Server, structural tracking data when using vehicleDRX, and interactions with ACS. In addition, if you use the Expenses app and following your instructions, we may also collect information about financial transaction data from your credit card issuer in order to offer the service.

h. **Content**. Content of your files and communications that you enter, receive, create and control. For example, if you transmit a file using vehicleDRX to another vehicleDRX user, we need to collect the contents of that file to show it to you and the other user. Other content we collect when providing products and services to you includes:

• Communications, including audio, video, text (typed, handwritten, dictated or otherwise generated), in messages, email, calls, conference or chat calls.

- Photos, images, software and other media or documents that you store, retrieve or otherwise process in ACS.
 - i. Video or recordings. Recordings of events and activities in buildings, commercial spaces and other locations. If you enter Algotive's physical locations or other facilities, or attend an Algotive event that is recorded, we may process your image and voice data.
 - j. **Comments and ratings**. Information you provide to us and the content of messages you send us, such as comments, survey data, and reviews of Products and Services you write.
 - k. **Traffic data**. Data generated by the use of Algotive's communications services. Traffic data indicates who you have communicated with and when the communications have occurred. We will only process traffic data that is necessary to offer, maintain and improve our communication services and we do so with your consent.

• In certain jurisdictions, we may request a government-issued ID in limited circumstances, including when setting up an Algotive Account and activating your device, for the purpose of extending business credit, administering reservations, or as required by law.

How We Use Your Personal Information

We may process your personal information in the following cases, to:

- The purposes described in this Privacy Policy, with your consent.
- Compliance with a legal obligation to which Algotive is subject.

• The performance of a contract to which you are a party, in order to protect your interests, or where we have assessed that it is necessary for the purposes of the legitimate interests pursued by Algotive or a third party to whom it may be necessary to disclose information.

• Provide our Products and Services, including updating, protecting and troubleshooting, as well as providing technical support. It also includes sharing data, when necessary to provide the service or perform the transactions you request.

- Improve and develop our Products and Services.
- Personalize our Products and Services and make recommendations.

• Advertise and market to you, including sending promotional communications, targeted advertising and presenting you with relevant offers.

We also use the data to operate our business, including analyzing our performance, complying with our legal obligations, developing our ability to work, and conducting research.

We have integrated technological and procedural security measures designed to prevent certain combinations of data, when required by law. For example, where required by law, we store the data we collect from you when you are not authenticated (without being logged in) separately from any Algotive Account information that directly identifies you, such as your name, email address or telephone number.

Our processing of personal data for these purposes includes both automated and manual (human) processing methods. Our automated methods are often related and supported by our manual methods. For example, our automated methods include artificial intelligence ('AI'), which we conceive of as a set of technologies that allow teams to perceive, learn, reason, and aid in decision-making to solve problems in ways similar to those of people. To compile, train, and improve the accuracy of our automated processing methods (including AI), we manually review some of the predictions and inferences produced by the automated methods against the underlying data from which the predictions and interferences were made. Algotive employees or suppliers who are working on Algotive's be able to carry out this manual review may be able to carry out this manual review.

When we process personal data about you, we do so with your consent and/or as necessary to provide the Products and Services you use, operate our business, comply with our contractual and legal obligations, protect the security of our systems and our customers, or satisfy other legitimate interests of Algotive, as described in this section.

More Information about the Purposes of Use

1. **Provide our Products and Services**. We use data to operate our Products and Services and provide you with interactive and rich experiences. In addition, as the communications are specific to various Products and Services, programs and activities, we use the data to contact you. For example, we may contact you by phone, email or other means, to inform you when a Product or Service license is ending or to discuss your Algotive Account. We also contact you, for example, to inform you that updates to Products and Services are available.

2. **Improvement of Products and Services**. We use data to continuously improve our Products and Services, including the addition of new features or functionalities. For example, we use bug reports to improve security features, usage data to determine which new features to prioritize.

3. **Personalization**. Many Products and Services include personalized features, such as recommendations that improve your productivity. These features use automated processes to personalize your Product experiences, based on the data we hold about you, such as the deductions we make about you and your use of the Product, activities, interests, and location.

4. Activation of Products and Services. We use data, such as device type and Product or Service, location, and unique device, application, network, and licensing data identifiers, in order to activate Products and Services that require activation.

5. **Development of Products and Services**. We use data to develop new Products and Services. For example, we use data, often depersonalized, to better understand the COMPUTing and productivity needs of our customers, which can shape the development of new Products and Services.

6. **Customer Support**. We use data to troubleshoot and diagnose problems with the Products and Services, provide other customer support and support services, for example, to help us provide, improve and protect the quality of our Products and Services, services and training, and investigate security incidents. Call log data can also be used to authenticate or identify you based on your voice, so that Algotive can provide technical support services and investigate security incidents.

7. Helps protection and troubleshooting. We use data to help protect our Products and Services and troubleshoot problems. This includes using data to protect the security of our Products and Services and customers, detecting malware and malicious activity, troubleshooting performance and compatibility issues, to help customers get the most out of their experiences, and also to notify customers of updates to our Products and Services. This may include using automated systems to detect security issues.

8. **Security**. We use data to protect the security of our Products and Services and our customers. Our features and Security Products and Services may disrupt the operation of malicious software and notify users if such software has appeared on their devices. For example, some of our Products and Services systematically analyze content automatically to identify viruses, criminal actions or URLs that have been marked as fraudulent, phishing or malicious software links; and we reserve the right to block the delivery of a communication or remove its content if it violates our Terms.

9. **Updates**. We use the data we collect to develop Product and Service updates and security patches. For example, we may use information about your device's capabilities, such as available memory, to provide you with a security patch or software update. Updates and patches are intended to maximize your experience with our Products and Services, to help you protect data privacy and security, provide new features, and assess whether your device is ready to handle updates.

10. **Promotional Communications**. We use the data we collect to deliver promotional communications. You can sign up for email subscriptions and choose whether to receive promotional communications from Algotive by email, SMS, physical mail or phone.

11. **Relevant Offers**. Algotive uses data to provide you with relevant and valuable information about our Products and Services. We analyze data across a variety of sources to predict the information that is most interesting and relevant to you and to offer you that information in a variety of ways. For example, we may predict your interest in certain functionalities of our Products and Services, and communicate with you to inform you about new Products or Services that may be of interest to you.

12. Advertising. Algotive does not use what you may say in emails, chat, video calls, or voicemail, or in your documents, photos, or other personal files to target ads to you. We use the data we collect through our interactions with you, through some of our Products and Services, and on third-party websites to advertise our Products and Services. We may use automated processes to help make advertising more relevant to you. For more information on how your data is used for advertising purposes, please see the Advertising section of this privacy statement.

If you have questions about this legal basis, you can contact the Legal & Global Security area through the mail lgs@algotive.ai.

Data Protection

The personal information we collect allows us to keep you informed about the latest Product and Service announcements, software updates, and upcoming Algotive events. If you do not wish to be on our mailing list, you can opt out at any time by requesting it via email.

We also use personal information to help us create, develop, operate, deliver, and improve our Products and Services, services, content and advertising, and for loss prevention and anti-fraud purposes. We may also use your personal information for Algotive Account and network security purposes, including to protect our services for the benefit of all our users, and to

pre-screen or scan uploaded content for potentially illegal content, including child sexual exploitation material. When we use your information for anti-fraud purposes, it arises from conducting an online transaction with us. We limit our use of data for anti-fraud purposes to those strictly necessary and within our legitimate interests assessed to protect our customers and our services. For certain online transactions, we may also validate information provided by you against publicly accessible sources.

We may use your personal information, including date of birth, to verify identity, assist with user identification, and determine appropriate services. For example, we may use the date of birth to determine the age of Algotive Account holders.

From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with Algotive, you may not opt out of receiving these communications.

We may also use personal information for internal purposes, such as audits, data analysis and research to improve Algotive's Products and Services, and communications with our Customers.

If you apply for a vacancy at Algotive or we receive your information in connection with a potential position at Algotive, we may use your information to evaluate your application and communicate with you. If you are a candidate, you will receive more information about how Algotive handles the candidate's personal information at the time of application.

Sources of your personal information when not collected from you

We may have received your personal information from others if that person has shared your content with you using Algotive Products and Services, submitted gift certificates and Products and Services, or invited you to participate in Algotive forums or services. We may also validate the information provided by you when creating an Algotive Account with a third party for security and fraud prevention purposes.

If you are a potential candidate to work with Algotive, we may have received your personal information from third parties, such as recruiters or external websites. We will use the personal information we receive to communicate with you about a potential opportunity or to evaluate your application. If you did not provide us with your personal information directly, we will inform you of the source when we first contact you regarding your application. For research and development purposes, we may use datasets such as those containing images, voices, or other data that could be associated with an identifiable person. When acquiring such datasets, we do so in accordance with the applicable law in the jurisdiction in which the dataset is hosted. When using such datasets for research and development, we do not attempt to re-identify people who may appear in them.

Collection and Use of Non-Personal Information

We also collect data in a form that, on its own, does not allow direct association with any specific individual. We may collect, use, transfer and disclose non-personal information for any purpose. The following are some examples of non-personal information we collect and how we may use it:

We may collect information such as occupancy, language, zip code, area code, unique device identifier, referring URL, location, and the time zone where a Algotive Product is used so that we can better understand customer behavior and improve our Products and Services, as well as advertising.

We may collect information about customer activities on our website, ACS Services and our other Products and Services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts

of our website as well as our Products and Services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

We may collect and store details of how you use our services. This information may be used to improve the relevance of the results provided by our services. Except in limited cases to ensure the quality of our services over the Internet, such information will not be associated with your IP address.

With your explicit consent, we may collect data about how you use your device and your applications to assist in the development of our Products and Services.

If we combine non-personal information with personal information, the combined information will be treated as personal information for as long as it remains combined.

Cookies and Other Technologies

Cookies are small text files placed on your device to store data that can be read by a web server in the domain that placed the cookie. Algotive's websites, online services, interactive applications, emails and advertisements may use "cookies". These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of ads and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

As mentioned, Algotive uses cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience with Algotive more comfortable and personal. For example, knowing your name allows us to welcome you the next time you visit ACS. Knowing your country and language helps us provide a personalized and more useful shopping experience. And knowing your contact information, hardware identifiers, and information about your computer or device helps us customize your operating system, configure your ACS, and provide you with better customer service.

If you wish to disable cookies in your browser, please check with your provider to find out the correct procedure. Please note that certain features of the Algotive website will not be available once cookies are disabled.

As with most Internet services, we collect certain information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet Service Provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data. We use this information to understand and analyze trends, administer the site, learn about user behavior on the site, improve our Products and Services and services, and gather demographic information about our user base as a whole. Algotive may use this information in our marketing and advertising services.

In some of our emails, we use a "URL link" linked to the content of the Algotive website. When customers click on one of these links, they go through a separate web server before reaching the landing page of our website. We track this click data to help us determine interest in particular topics and measure the effectiveness of our communications with customers. If you prefer not to be tracked in this way, you should not click on text or graphic links in emails. We may use this information to reduce or delete messages sent to customers.

Disclosure to Third Parties

From time to time, Algotive may provide third parties with certain personal information to provide or improve our Products and Services, including to deliver Products and Services at your request, or to help Algotive market to consumers. When we do, we require those third parties to handle it in accordance with the relevant laws. Algotive does not sell personal information and personal information will never be shared with third parties for their marketing purposes. For example, when you purchase and activate a VDRD from Algotive, you authorize Algotive and its operator to exchange the information you provide during the activation process to carry out the service, including information about your device. If you are approved for the service, your Algotive Account will be governed by Algotive and the respective privacy policies of its provider.

We share your personal data with your consent or when it is necessary to complete any transaction or provide any Product you have requested or authorized.

When you provide payment data to make a purchase, we will share payment data with banks and other entities that process payment transactions or provide other financial services, as well as for fraud prevention and credit risk reduction. In addition, we share personal data between affiliates and subsidiaries controlled by Algotive. We may also disclose personal data as part of a corporate transaction, such as a merger or sale of assets.

Finally, we will maintain, access, transfer, disclose and preserve personal data, including its contents, when we believe in good faith that it is necessary to do so for any of the following reasons:

• Comply with applicable laws or respond to valid legal process, including those related to compliance with laws and those of other government agencies.

• Protect our customers, for example, attempts to defraud users of our Products and Services, or to help prevent loss of life or serious injury to people.

• Operate and maintain the security of our Products and Services, including preventing or stopping attacks on our computer systems or networks.

• Protect the rights or property of Algotive, including enforcing the terms governing the use of the Services. However, if we receive information indicating that someone is using our services for trafficking in intellectual or physical property stolen from Algotive, we will not inspect the customer's private content ourselves, but will refer the matter to public safety authorities and/or any relevant authority.

Service Providers

Algotive shares personal information with companies that provide services such as information processing, granting credit, fulfilling customer orders, delivering Products and Services, managing and improving customer data, providing customer service, evaluating your interest in our Products and Services, and conducting customer research or satisfaction surveys. These companies are required to protect your information and may be located wherever Algotive operates.

Other

It may be necessary – by law, legal process, litigation and/or requests from public and governmental authorities within or outside your country of residence – for Algotive to disclose your personal information. We may also disclose information about

you if we determine that for purposes of national security, law enforcement, or other matters of public importance, disclosure is necessary or appropriate. We may also disclose information about you, but only where there is a legal basis to do so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. This could include providing information to public or government authorities. In addition, in the event of a reorganization, merger or sale, we may transfer all personal information we collect to the relevant third party.

Protection of Personal Information

Algotive takes the security of your personal information very seriously. Algotive's online services, such as ACS, protect your personal information during transit using encryption, such as Transport Layer Security (TLS). When Algotive stores your personal data, we use computer systems with limited access hosted in facilities that use physical security measures. ACS data is stored in encrypted form, even when we use third-party storage.

When you use some Algotive Products and Services, or applications or post on an Algotive forum, chat room or social media service, the personal information and content you share are visible to other users and may be read, collected or used by them. You are responsible for the personal information you choose to share or submit in these cases. For example, if you include your name and email address in a forum post, that information is public. Be careful when using these features.

The Existence of Automated Decision Making, Including Profiling

Algotive does not make any decisions that involve the use of algorithms or profiling that significantly affect it.

Integrity and Retention of Personal Information

Algotive makes it easy for you to keep your personal information accurate, complete and up to date. We will retain your personal information for the period necessary to fulfill the purposes described in this Privacy Policy and in the privacy summaries specific to our service. In evaluating these periods, we carefully examine our need to collect personal information and, if we establish a relevant need, we only retain it for the shortest possible period to achieve the purpose of the collection, unless a longer retention period is required by law.

Your Privacy Rights

You can help ensure that your contact information and preferences are accurate, complete and up-to-date by logging into your Algotive Account page. For other personal information we hold, we will provide you with access (including a copy) for any purpose, including to request that we correct the data if it is inaccurate or delete the data if Algotive is not required to retain it by law or for legitimate business reasons.

We may refuse to process requests that are frivolous/vexatious, endanger the privacy of others, are extremely impractical, or whose access is not required by local law. We may also reject aspects of deletion or access requests if we believe that doing so would undermine our legitimate use of the data for security and anti-fraud purposes, as described above.

California

The California Consumer Privacy Act gives California consumers the right to obtain from Algotive information about the personal information about you that we collect, use, and disclose. You can exercise your rights through an authorized agent. You or your

agent can make a request electronically. If you choose to exercise your privacy rights, you have the right not to receive discriminatory treatment or a lower degree of service from Algotive.

Nevada

You have the right to opt out of the sale of your personal information. Algotive does not sell your personal information.

Location-Based Services

To provide services related to Algotive's location-based Products and Services, Algotive and our partners and licensors, such as map data providers, may collect, use, and share accurate location data, including the real-time geographic location of your devices. When available, location-based services may use GPS, Bluetooth, and your IP address, along with Wi-Fi access points and collectively sourced cell tower locations, and other technologies to determine the approximate location of your devices. Unless you provide your consent, this location data is collected anonymously on a form that does not personally identify you and Algotive and our partners and licensors use it to provide and improve Location-Based Products and Services. For example, your device may share your geographic location with app providers when you opt in to their location services.

Some location-based services offered by Algotive require your personal information to function.

Third Party Sites and Services

Algotive's websites, Products and Services, applications and services may contain links to third-party websites, products and services. Our Products and Services may also use or offer third-party products and services, for example, a third-party application installed on an Algotive VDRD Server.

Information collected by third parties, which may include location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

International Transfers

All information you provide may be transferred to or accessed by legal entities around the world as described in this Privacy Policy. Algotive, as a global company, has a number of legal entities in different jurisdictions that are responsible for the personal information they collect that is processed on their behalf by Algorithmic Objective Corp. For example, point-of-sale information at our retail entities outside the United States is controlled by our individual retail entities in each country. Personal information relating to Algotive and ACS may also be controlled by legal entities outside the U.S. as reflected in the terms of each service. Images and associated data collected by Algotive worldwide to improve Algotive's Products and Services, and in support of the current features of our Products and Services, are transferred to Algorithmic Objective Corp. in California.

Our Organizational Commitment to Your Privacy

To ensure that your personal information is secure, we communicate our privacy and security guidelines to Algotive employees and strictly enforce privacy guarantees within the company.

Privacy Questions

If you have any questions or concerns about Algotive's Privacy Policy or data processing, you would like to contact our Data Protection Officer, or if you would like to file a complaint about a possible violation of local privacy laws, please contact us.

When a privacy question or a question about personal information received in response to an access/download request is received, we have a dedicated team that classifies your contact to address your issue. When your problem may be more important in nature, we may ask you for more information. All of these substantive contacts receive a response within seven (7) days, whenever possible, providing a response on the issue raised, requesting additional information when necessary, or indicating that a response will require additional time. At any time, you can refer your complaint to the relevant regulator in your jurisdiction if you are not satisfied with a response we send you. If you ask us, we will do our best to provide you with information about relevant complaint avenues that may be applicable to your circumstances. Where your complaint causes us to believe that an improvement could be made in our handling of privacy issues, we will take steps to make such an update at the next reasonable opportunity. In the event that a privacy issue has had a negative impact on you or someone else, we will take steps to address it with you or that other person.

Algotive may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy. We will also contact you through your registered contact information, for the downloaded the transformed to the transformed t example, by email, notification or some other equivalent method. Algorithmic Objective Corp.