Tectonix is a data visualization company. Our tools and platform support complex data analytics, allowing information to be overlaid onto mapping functions. This Privacy Policy describes our practices with information that we collect from individuals (sometimes referred to as “you” or “your”) through our website, www.tectonix.com (the “Site”), as well as data we acquire from third parties.

Except as noted in Section I, below, Tectonix doesn’t collect data directly from individuals, and we don’t use Personal Information in our tools. Instead, we partner with customers in two different ways: by making our tools and platform available to customers who use them to work with their own data, and by creating visualizations from data that’s been provided to us, through a purchase or licensing agreement, for purposes including public health and other analysis.

Definitions:

“Personal Information” and “personal data” mean information that specifically identifies an individual (such as a name, e-mail address, etc.) or information relating to you, your computer, or your device and that enables your identification. Personal Information does not include “de-identified” or “aggregate” information, which is data that cannot be used to identify an individual. Where relevant, “personal information” and “personal data” are used consistent with the definitions in applicable law, as set forth in Sections 10 and 11, below.

Section 1. Information we obtain from you.

a. Personal Information that you provide.

We collect your Personal Information when you voluntarily provide it to us. For example, you may give us: your email address if you choose to receive newsletters, updates, or other information from us; your contact information, and any other personal data you choose to include, if you email us or contact us through the Site; and any personal data contained in, or included with, feedback, comments or other information you submit via online portals, forms, surveys, or interactive portions of our website.

b. Technical data that we collect automatically through the Site, including cookies and similar technologies.

We use cookies and similar tracking technologies to track the activity on the Site. Cookies are files with a small amount of data which may include an anonymous unique identifier.

Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags, and scripts to collect and track information and to improve and analyze the Site.

If you have consented to our use of cookies, we will automatically collect the following types of data when you browse and search the Site:
• Technical information, such as the type of device you use to access the Site and its unique device identifier, the internet protocol (IP) address used to connect your device to the Internet, and other information relating to the device, including the browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform, and

• Information about your activity on our site, including the pages you viewed, page response times, download errors, length of visits to certain pages, clickstream to, through, and from the Site, and previous and next URL and methods used to browse away from the page.

You can manage your cookie settings in your browser. For more information about cookies, including how to see what cookies have been set and how to manage and delete them, you can consult an independent source not affiliated with us, such as http://www.allaboutcookies.org/.

Section 2. Section 2: How Tectonix tools interact with data

a. Our customers’ use of our tools and platform with information they have acquired

We license the use of our tools and platforms to customers who use our analytics and visualization tools to assess their own data. In those cases, we rely on our customers to have in place appropriate privacy policies and data protection practices, and our customers are solely responsible for ensuring that the means in which they use their data is consistent with all applicable legal obligations and restrictions governing their activities.

b. Tectonix’s use of information we obtain from third-party sources

We may license or purchase de-identified or anonymized data from third parties for purposes of developing and testing our platform and tools.

We protect information obtained from third parties according to the practices described in this Policy, plus any additional restrictions imposed by the source of the data.

b.1. Third party data sources:

Third-party sources of data that we analyze may include, for example:

• Data aggregation and management platforms that collect precise location information of mobile device users for purposes including location-based advertising and research to develop insights for financial or market research, traffic and city planning, smart cities, educational, public health, and other purposes;

• Service providers that collect, aggregate, and de-identify location-based information derived from mobile device applications;
• Partners with which we offer co-branded services or engage in joint marketing activities; and

• Publicly available sources, such as open government databases or other information in the public domain.

b.2. **Third party data types**

The types of information we may acquire or license from these third parties may include any of the following device information:

**Precise Location Data:**

• Geolocation of the Device;

• Dwell time near points of interest (or how long a given device stayed in one place);

• Precise location data (usually expressed by latitude-longitude coordinates obtained through GPS, WiFi data, cell tower triangulation and other techniques permitted by the Device’s operating system).

**Relative Location Data:**

• Bluetooth Low-Energy (BLE) sensors, or beacons;

• Signals from the Internet of Things (IoT) devices, such as smartwatches or smart home devices; and

• Near-field Communication (NFC).

• This relative location data is collected when an application registers signals from other nearby devices, such as beacons that detect when a Bluetooth-enabled Device passes by.

**Advertising IDs, or Unique Device Identifiers for Advertising**

• Android ID or iOS IDFA

**Time and Date Information**

Event information about a Device, such as crashes, system activity, and hardware settings

**Usage information that does not identify an individual user (“Usage Data”):**

• Device type;
• Operating system version and type;
• Certain device settings;
• Device time zone;
• Device carrier; and
• Current IP address.

Section 3. How We Use the Information We Collect or Receive

a. Our use of Personal Information We Collect From You:

As described in Section 1, there may be information that you voluntarily provide to us or that we collect from you automatically when you visit our website. This subsection describes how we may use that information.

We may use information you provide to contact you concerning the services or products we offer or developments we think might be relevant to your interest in our services or products. If you no longer wish to receive communications from us, you may opt-out of receiving them by following the instructions included in each communication or by emailing us at privacy@tectonix.com. We may also use Personal Information we automatically collect through the Site in order to optimize the operation of the Site, to improve the delivery of our products or services, to develop analytics concerning users of the Site, or to identify or authenticate users of our products or services.

b. Our Use of Personal Information Provided By Third Parties:

As described in Section II, there may be information about you that is provided to us by third parties. This subsection describes how we may use that information.

Inferences from Aggregated Data: We may use information we acquire from third parties to make inferences about human location and traffic patterns. For instance, we might notice groups of devices at certain types of locations or venues over time, like stadiums, cities, neighborhoods, or beaches, and we might curate these insights into data products.

Aggregated Traffic Patterns and Research: We may also share information we acquire from third parties with other entities, who use the information to provide similar services. These entities may include research companies, media outlets, public health officials, or others who need to understand patterns of travel and movement. For example, if an aggregate group of devices start in one location, such as a crowded beach, and disperse to multiple locations, that movement may provide insights on the risks associated with the spread of communicable disease.

The above is not an exhaustive description of all of the ways the information we acquire from third parties may be used: we may, for instance, sometimes customize uses of
information we acquire from third parties to meet the needs of certain customers. But the above does describe the categories of information that we collect or acquire, how we generally collect or acquire it, and our practices concerning the use of that information.

Section 4. **How We Share Personal Information We Collect**

We may share Personal Information we collect through the Site or that you provide to us with our subsidiaries (if any) and our service providers and their subsidiaries, as discussed in the preceding Section. We may also share Personal Information we collect through the Site or that you provide to use for the following purposes, as discussed in the preceding Section:

- In connection with Legal Proceedings or Process
- To Investigate Wrongdoing and Protect Ourselves or Third Parties
- In Connection with a Sale of Our Business

Section 5. **How We Share Information We Acquire from Third Parties**

We share the information we acquire from third parties both in order to operate our platform (such as with service providers) and in order to support the operations of our customers. We may share the following information we acquire from third parties:

(a) **With Our Customers**: We may share information we acquire from third parties, including Advertising IDs, Location Information, and Usage Data, with our customers. Our customers may include government departments or agencies, data platforms, academic institutions, and companies that perform research about consumer behavior, targeted or customized advertising, or human traffic patterns.

(b) **With Our Service Providers**: We contract with companies who help us with our business operations (for example, website and data hosting, fraud prevention, verification and reporting, data hygiene, marketing, and email delivery), as well as billing, collections, tech, customer and operational support.

(c) **With Service Providers to Our Customers**: Our customers may contract with companies who handle data (such as managing Customers proprietary data, including Ad IDs).

(d) **With Our Subsidiaries and Related Companies**: We currently do not have subsidiaries or corporate affiliates, but if we do, we may share any information that we hold with them. We may also provide any information that we hold to any entity that purchases Tectonix or all or substantially all of our assets.

(e) **In Connection with Legal Proceedings or Process**: We may share information, including Personal Information, with applicable authorities or parties when we are under a legal obligation to do so, for example, to comply with a binding order of a court, or where disclosure is necessary to exercise, establish or defend the legal
rights of Tectonix, our customers or any other third party or to satisfy in good
faith any applicable law, legal process. We likewise may disclose any information
in response to a proper governmental request, a subpoena (whether civil or
criminal) or a similar process.

(f) **To Investigate Wrongdoing and Protect Ourselves or Third Parties:** To
enforce our rights and Terms of Service or other policies, or to investigate any
potential violation of those Terms and policies, any potential violation of the law,
or to protect ourselves, our customers, or any third party from any potential harm
(whether tangible or intangible).

(g) **In Connection with a Sale of Our Business:** If a third party acquires some or all
of our business or assets, we may disclose your information in connection with
the sale (including during due diligence in preparation for the sale).

Section 6. **Consumer Choices & Opt-Out Options**

There are several ways that you can manage the way that passively collected data, such as
Advertising IDs and cookies, are used. Although Tectonix does not directly collect the
information used by our platform and tools, we understand that you may have questions
about how to prevent that information from being collected by the third parties who
might then sell or license your information to Tectonix. With that in mind, this section
describes the methods you may use to limit collection of this information.

(a) **Browser Settings:** You may control how your browser responds to cookies by
adjusting the privacy and security settings of your web browser.

(b) **Interest-Based Advertising Opt-Out:** You can opt-out of information collected
for web-based interest-based advertising (for instance, by tailoring ads based on
activities tracked across websites, over time), by those companies that participate
in the Network Advertising Initiative or the Digital Advertising Alliance, by
visiting the NAI’s opt-out page or the DAA’s Consumer Choice Page.
Residents of the European Economic Area and Switzerland, please refer to
[www.youronlinechoices.com](http://www.youronlinechoices.com). The “opt-out” methods on these industry web
portals generally are cookie-based, so if you delete your cookies (or change or
update your browser) you will need to opt-out again.

(c) **Device-based Opt-out (for Cross-App Advertising):** You may limit the
disclosure of certain Information by your mobile device by adjusting the settings
on your mobile Device. For iOS mobile devices, go to “Settings” from your
Device’s home screen; scroll down to “Privacy”; select “Advertising”; and turn
on “Limit Ad Tracking.” For Android mobile devices, go to “Google Settings” on
your device; select “Ads”; and check the box labeled “Opt Out of Interest-Based
Ads.”

(d) **Our Promotional Emails:** You may opt not to receive promotional emails from
us by contacting us as indicated below, or by following the “unsubscribe”
instructions in any promotional email you receive from us, or by contacting us at
privacy@tectonix.com. Please note that, however, we may still send you non-promotional, transactional, or service-related emails about your relationship with us.

Section 7. Security

We employ administrative, technical, and physical safeguards for our physical facilities and in our computer systems, databases, and communications networks, which are designed to protect information contained within our systems from loss, wrongful acquisition, use, alteration or disclosure. No method of electronic transmission or storage is 100% secure, which means we cannot guarantee absolute security of your information. However, we limit access to Location Data or Advertising IDs we acquire from third parties to specific employees and third parties who have a business need to know and who are bound by a duty of confidentiality. If you have any questions about the security of your information, please contact us through the contact information listed in this Policy.

Section 8. Data Retention

As a general matter, we retain your Personal Information for as long as necessary to carry out the activities described in this Policy, or for other important purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements. Please note that we may retain this (and other) Information whenever and so long as we have a significant legal or operational need to do so, such as for auditing, corporate record-keeping, compliance accounting or security and bug-prevention purposes.

Section 9. International Transfers

We may store and process your information in the United States. By accessing the Site or our Services, you understand that the information you provide to us may be stored in or (if applicable) transferred to the United States. You should be aware that certain privacy laws in the United States and the other countries regarding processing the information may be less stringent than in your country.

Section 10. The European Union General Data Protection Regulation

To the extent that any information we collect or acquire from third parties is subject to the European Union General Data Protection Regulation (“GDPR”), Regulation (EU) 2016/679, and you are located within the European Economic Area (“EEA”) the following provisions apply.

a. Basis for processing

The processing of your personal data is based on the following legal grounds:

• Performance of a contract. When we need to process your personal data to enter into a contract with you or your employer or to perform a contract that you or your employer may have with us, the processing is based on Article 6, section 1
(b) GDPR. For example, when you use our services, we will use your personal data to respond to your requests and provide you with such services.

- **Consent.** When we process personal data based on your consent, the legal grounds for processing is Article 6 section 1 (a) GDPR.

- **Legal obligation.** When the processing of personal data is necessary for compliance with a legal obligation to which we are subject, the processing is based on Article 6 section 1 (c) GDPR.

- **Legitimate interests.** We may process your personal data for our legitimate interests, e.g., to improve our products and services and to provide you with relevant information including information for marketing purposes. When we process your personal data based on our legitimate interests, the legal grounds for such processing is Article 6, section 1 (f) GDPR.

**b. Your Rights in the EEA**

If you are a data subject based in the EEA, under the terms of the GDPR, you have the following rights:

- **The right to information.** Under Art. 13 you have the right to be informed whether and to what extent we process your personal data.

- **The right of access.** Under Art. 15, you have the right to get a confirmation as to whether or not we process your personal data, and only if we (still) do, request access to your data.

- **The right to rectification.** Under Art. 16, you have the right to request correction of your personal data, or completion, in case that the data we process is incorrect or incomplete.

- **The right to deletion.** Under Art. 17 you have the right to request deletion of your personal data. Yet, an immediate deletion may not be possible, if the retention of your personal data is still required to meet legal or regulatory obligations.

- **The right to restrict the processing.** Under Art. 18, you have the right to request a restriction of the processing of your personal data under certain conditions: a) If you have reasons to doubt the accuracy of your personal data, you may request that its processing is restricted while we verify its accuracy, b) If the processing of your personal data is considered unlawful, but you do not request the deletion of your personal data, c) If we no longer need the data for the purposes of its processing, but you need it for the establishment, exercise or defense of legal claims, d) If you object to the processing of your personal data based on our legitimate interests under Art. 6(1) (f) GDPR, or where the processing is based on Art. 6(1) (e) GDPR.
The right to data portability. Where the processing takes place on the basis of your consent or contract, and is carried out by automated means, you have the right to request that we provide your personal data to you in a machine-readable format.

The right to object to the processing. Under Art. 21, you have the right to object to the processing of your personal data in certain situations.

Rights in relation to automated decision making and profiling. Under Art. 21, you have the right to object to decisions based exclusively on the automated processing of your personal data.

The right to withdraw your consent. If your personal data is processed on the basis of your consent (Art. 6 (1) (a) or Art. 9 (2) (a) GDPR), you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

You also have the right to file a complaint with a competent supervisory authority. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available at ec.europa.eu.

Section 11. Addendum for California Resident’s Privacy Rights

To the extent that the California Consumer Privacy Act of 2018 (“CCPA”), Cal. Civ. Code § 1798.100 et seq., applies to our processing of information we collect or acquire from third parties, and you are a California consumer under the terms of the CCPA, the following provisions apply.

Scope. This section applies to Personal Information that we handle as a “business” (as defined under the CCPA) if you are a California resident. For purposes of this Section, “Personal Information” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In addition, this section does not apply to any Personal Information reflecting communications or transactions with you in your capacity as an employee, controlling owner, director, officer or contractor of a company, partnership, sole proprietorship, non-profit or government agency, where your communications or transactions with us occur solely within the context of our provision of services to, or receipt of services from, such an entity.

Tectonix does not sell (as such term is defined in the CCPA) the Personal Information we collect or that you provide to us (and will not sell it without providing a right to opt out).

Your California privacy rights. You have the following rights under the CCPA:

• Information. To request the following information about how we have collected and used Personal Information during the past 12 months:
  o The categories of Personal Information that we have collected.
The categories of sources from which we collected Personal Information.

The business or commercial purpose for collecting Personal Information.

The categories of third parties with whom we share Personal Information.

Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information disclosed to each category of third party recipient.

- **Access.** To request a copy of the Personal Information that we have collected about you during the past 12 months.

- **Deletion.** To request that we delete the Personal Information that we have collected from you.

- **Nondiscrimination.** To exercise the rights described above free from discrimination as provided in the CCPA. We do not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise these rights.

- **Information About Persons Under 16 Years of Age:** We do not knowingly collect personal information from minors under 16 years of age in California unless we have received legal consent to do so. If we learn that personal information from such California residents has been collected, we will take reasonable steps to remove their information from our database (or to obtain legally required consent).

**How to exercise your rights.** You may submit a request to exercise your information, access or deletion rights by emailing privacy@tectonix.com. We will need to verify your identity to process your information, access and deletion requests and we reserve the right to confirm your California residency. Government identification may be required. If you wish to designate an authorized agent to make a request on your behalf, we will need to verify both your and your agent’s identities and your agent must provide a valid power of attorney or other proof of authority acceptable to us in our reasonable discretion. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. In certain cases, we may be required or permitted by law to deny your request.

**Collection, use and disclosure of Personal Information.** The categories of Personal Information that we purchase or license and the sources from which we obtain them are described above in Section 2, “How Tectonix Tools Interact with Data.” These categories include advertising identifiers, location data, and related device and internet activity information as described in Section 1798.140(o) of the CCPA. The business/commercial purposes for which we use these categories of Personal Information are described above in Section 3 “How We Use the Information We Receive.” The categories of third parties to which we these categories of Personal Information are
described above in Section 4, “How We Use Information in our Tools and Platform.” The foregoing describes our practices as of, and during the twelve month period preceding, the effective date of the Privacy Policy.

Section 12. **Changes to Our Privacy Policy**

If we make changes to this Privacy Policy that may impact you, we will post those changes on our Site. We recommend that you check the Privacy Policy frequently so that you are informed of any changes.

Section 13. **How to Contact Us**

If you have any questions about this Privacy Policy or how we use information, or if you seek to exercise any of the rights outlined above, please contact us at:

privacy@tectonix.com

OR

800-674-3509

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