

Tectonix is a data visualization company. Our tools and platform support complex data analytics, allowing information to be overlaid onto mapping functions.

Except as noted in Section I, below, our website privacy policy below, Tectonix doesn't collect data directly from individuals, and we don't use personally identifiable 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 the purpose of creating visualizations for purposes including public health and other analysis.

Section I: Information we obtain from you.

a. Personal data that you provide about yourself.

We collect your personal data 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 our websites; 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, including cookies and similar technologies.

We use cookies and similar tracking technologies to track the activity on our websites. 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 our websites.

If you have consented to our use of cookies, we will automatically collect the following types of data when you browse and search our site:

- Technical information, such as the type of device you use to access our 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 website, 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, please visit, <http://www.allaboutcookies.org/>.

Section 2: How Tectonix tools interact with data

a. Our customers' use of our tools and platform for their information

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.i. Third party data sources

These third-party sources 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.ii. Third party data types

The types of information provided by these third parties may include any of the following device information:

- a. **Precise Location Data:**

- Geolocation of the Device,
- dwell time near points of interest (or how long your device stayed at 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).

b. 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.

c. Advertising IDs, or Unique Device Identifiers for Advertising (Android ID or iOS IDFA)

d. Time and Date Information

e. Event information about your Device, such as crashes, system activity, and hardware settings

f. 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 Receive

Inferences from Aggregated Data: We may use the information we collect 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 use these observations in our products. We curate these insights into data products.

Aggregated Traffic Patterns and Research: We also share the information we receive with other research companies, who use the information to provide similar services. This helps these companies to better predict and draw insights about consumer, market or scientific trends related to human movement patterns. This same information may also be licensed to public health officials, city planners or smart city companies, 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 collect may be used: we may, for instance, sometimes customize uses of the information we have for certain customers. But the above does describe the types of information that we collect, how we generally collect it, and what our company focuses on.

Section 4. How We Share Information We Use In Our Tools and Platform

We share the information we collect and receive 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 collect from your Device:

- a. **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.
- b. **With Service Providers to Our Customers:** Our customers may contract with companies who handle data (such as managing Customers proprietary data, including Ad IDs).
- c. **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 will also provide any information that we hold to any entity that purchases Tectonix or all or substantially all of our assets.
- d. **In Connection with Legal Proceedings or Process:** 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.
- e. **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).
- f. **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 5. 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](#). EEA and Swiss residents, please refer to www.youonlinechoices.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. We provide the above information because — although our services are not focused on cookie-based advertising — we may work with companies to target ads for our own services (such as to retarget Visitors of our own website).
- 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 [\[email\]](#). Please note that, however, we may still send you non-promotional, transactional, or service-related emails about your relationship with us.

Section 6. 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 collect 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 7. Data Retention

Personal Data Retention: As a general matter, we retain your Personal Data 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 8. International Transfers

We may store and process your information in the United States. By accessing this website 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 9. The European Union General Data Protection Regulation

a. Basis for processing

The processing of your personal data is based on the following legal grounds, if you are a resident of the European Economic Area (EEA):

- 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

As a data subject based in the EEA, you have the following rights:

- The right to information (Art. 13 GDPR). This is your right to be informed whether and to what extent we process your personal data.

- The right of access (Art. 15 GDPR). This is your 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 (Art. 16 GDPR). This is your 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 (Art. 17 GDPR). This is your 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 (Art. 18 GDPR). This is your 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 (Art. 20 GDPR). 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 (Art. 21 GDPR). 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 (Art. 22 GDPR). 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 10. Addendum for California Resident’s Privacy Rights

Scope. This section applies to your Personal Information that we handle as a “business” (as defined under the California Consumer Privacy Act of 2018 (“**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 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 (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 your Personal Information during the past 12 months:
 - 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 11. Changes to Our Privacy Policy

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

Section 12. 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