



Unisoft International, Inc., dba SMA Technologies Our Privacy Policy

Last Updated: May 18, 2022

1. Introduction

- a. We are committed to safeguarding the privacy of our website visitors and service users.
- b. This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- c. We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- d. Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via www.smatechnologies.com.
- e. In this policy, "we", "us" and "our" refer to Unisoft International, Inc. (dba SMA). For more information about us, see Section 12.

2. How we use your personal data

- a. We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is consent OR our legitimate interests, namely monitoring and improving our website and services.
- b. We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you. The legal

- basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- c. We may process your information included in your personal profile on our website ("profile data"). The profile data may include your name, address, telephone number, email address, profile pictures, company name, industry, and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business, online employment applications, OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
 - d. We may process your personal data that are provided in the course of the use of our services ("service data"). The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
 - e. We may process information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
 - f. We may process information contained in any inquiry you submit to us regarding goods and/or services ("inquiry data"). The inquiry data may be processed for the purposes of offering, marketing, and selling relevant goods and/or services to you. The legal basis for this processing is consent.
 - g. We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of

managing our relationships with customers, communicating with customers, keeping records of those communications, and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships.

- h. We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details, and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- i. We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- j. We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- k. We may process any of your personal data identified in this policy where necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.
- l. We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- m. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such

processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

- n. Please do not supply any other person's personal data to us unless we prompt you to do so.

3. Information Collected Related to California Residents

Category	Type of Identifiers We Collect	Collected
Identifiers.	A name, postal address, telephone number, unique personal identifier, online identifier, Internet Protocol address, personal email address, business email address.	YES
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, postal address, telephone number, employment, employment history.	YES
Protected classification characteristics under California or federal law.	Age, sex (including gender, gender identity, gender expression).	YES
Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement, meta data used for matching.	YES
Geolocation Data	Physical location or movements.	YES
Professional or employment-related information.	Current or past job history or performance evaluations.	YES
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends,	YES

	predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	
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- a. We obtain the categories of Personal Information listed above from the following categories of sources:
 1. Directly from users or their agents
 2. Indirectly from our customers or their agents. For example, through information we collect from our clients in the course of providing Services to them
 3. Directly and indirectly from activity on our website (www.smatechnologies.com). For example, from website usage details that are collected automatically. In addition, like many companies, we use “cookies” which are small text files a website can use to recognize repeat users, facilitate the user’s ongoing access to and use of the site and to track usage behavior of, for example, the webpages you visit
 4. From third parties that assist us in providing certain transactions and services, even though it appears that you may not have left our Site
- b. In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for one or more business purposes:
 1. Identifiers
 2. California Customer Records Personal Information categories
 3. Protected classification characteristics under California or federal law
 4. Commercial information
 5. Internet or other network activity information
 6. Professional or employment-related information
 7. Geolocation Data
 8. Inferences drawn from other personal information
- c. We disclose your Personal Information for a business purpose to the following categories of third parties:
 1. Our affiliates
 2. Strategic business partners who provide goods, services and offers that enhance your experience at our properties, or that we believe will be of interest to you
 3. Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with the Services we provide to you
 4. Service providers and other third parties we use to support our business, including without limitation those performing core services (such as reservations, billing, credit card processing, customer support services,

customer relationship management, property management, accounting, auditing, processing insurance claims, administering sweepstakes, surveys, advertising and marketing, analytics, email and mailing services, data storage, and security) related to the operation of our business and/or the Services, the operation of our properties and properties operated under our family of trademarks, the fulfillment of your orders, and making certain functionalities available to our users

5. Commercial providers
6. Enterprise accounts, such as your employer.

4. Providing your personal data to others

- a. We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- b. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- c. We may disclose personal data to our suppliers or subcontractors insofar as reasonably necessary.
- d. Financial transactions relating to our website and services are OR may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds.
- e. We may disclose your inquiry data to one or more of those selected third-party suppliers of goods and services for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the inquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- f. In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- g. In the preceding twelve (12) months, we have not sold any Personal Information.

5. International transfers of your personal data

- a. We have centralized some of our data processing activities in accordance with applicable laws, and as a result, we may, directly or indirectly through our organization and affiliates, and through third-party entities around the world, process, store, and transfer the information you provide, including your Personal Information, as described in this Privacy Policy. Specifically, the information and Personal Information that we collect may be transferred to, and stored at, a location outside of your jurisdiction. The jurisdiction where your Personal Information will be processed may or may not have laws that seek to preserve the privacy of Personal Information. Your Personal Information may also be processed by staff operating outside of your jurisdiction who work for us or for one of the organizations outlined in this Privacy Policy in connection with the activities outlined in this Privacy Policy. By submitting your Personal Information using the Sites, you agree to this transfer, storing or processing. We will take all steps necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy. We have put in place commercially reasonable technical and organizational procedures to safeguard the information and Personal Information we collect on the Sites.

6. Retaining and deleting personal data

- a. This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- b. Personal data that we process for any purpose or purposes shall not be kept for longer than is reasonably necessary for that purpose or those purposes to carry out legitimate business interests, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).
- c. Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- d. After expiry of the applicable retention periods, your Personal Information will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, such as SMA's IT backup data which will be deleted over a course of time, we will put in place appropriate measures to prevent any further use of such data.

7. Amendments

- a. We may update this policy from time to time by publishing a new version on our website.

- b. You should check this page occasionally to ensure you are happy with any changes to this policy.
- c. We may notify you of changes to this policy by email or through the private messaging system on our website.

8. Your rights

- a. In this Section 8, we have summarized the rights that you have under data protection law. You may have certain rights relating to your Personal Information, subject to local data protection law. Whenever you choose to visit our Site or use our Services, we aim to provide you with choices about how we use your Personal Information. Subject to applicable law, you may obtain a copy of Personal Information we maintain about you. In addition, if you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the “Our Details” section below. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information.

Privacy Rights Specific to European Union Residents

- b. The European Union’s General Data Protection Regulation (“GDPR”), and corresponding legislation in the United Kingdom and Switzerland, provide European, Switzerland and United Kingdom residents with certain rights in connection with Personal Information you have shared with us. If you are resident in the European Economic Area, you may have the following rights:
 - 1. the right to access;
 - 2. the right to rectification;
 - 3. the right to erasure;
 - 4. the right to restrict processing;
 - 5. the right to object to processing;
 - 6. the right to data portability;
 - 7. the right to complain to a supervisory authority; and
 - 8. the right to withdraw consent.
- c. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

- d. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- e. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defense of legal claims.
- f. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: 1) you contest the accuracy of the personal data; 2) processing is unlawful but you oppose erasure; 3) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise, or defense of legal claims; and 4) you have objected to processing, pending the verification of that objection.
- g. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: 1) with your consent; for the establishment, exercise, or defense of legal claims; 2) for the protection of the rights of another natural or legal person; or 3) for reasons of important public interest.
- h. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise, or defense of legal claims.
- i. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- j. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

- k. To the extent that the legal basis for our processing of your personal data is:
 - 1. consent; or
 - 2. that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- l. If you consider that our processing of your personal information infringes upon data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- m. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- n. You may exercise any of your rights in relation to your personal data by written notice to us.

Privacy Rights Specific to California Residents

- o. Under the California Consumer Privacy Act, California residents have specific rights regarding their personal information. This section describes Californians' rights and explains how California residents can exercise those rights. Below we further outline specific rights which California residents may have under the California Consumer Privacy Act.
 - 1. Right to Access Your Data. You have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past twelve (12) months. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
 - 2. Right to Data Portability. You have the right to a "portable" copy of your Personal Information that you have submitted to us. Generally, this means you have a right to request that we move, copy or transmit your Personal Information stored on our servers or information technology environment to another service provider's servers or information technology environment.
 - 3. Right to Delete Your Data. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will

delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

4. Right to Non-Discrimination for the Exercise of Your Privacy Rights. You have the right not to receive discriminatory treatment by us for exercising your privacy rights conferred by the California Consumer Privacy Act.

p. Exercising Your Rights

1. If you are a California resident who chooses to exercise your rights, you can:
 - a. Submit a request via email to privacy@smatechnologies.com, or
 - b. Call (877)762-6584 to submit your request.

You may also designate an agent to exercise your privacy rights on your behalf. In order to designate an authorized agent to make request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification.

q. Our Response to Your Request

1. Upon receiving your request, we will confirm receipt of your request by sending you an email confirming receipt. We will take the following steps to attempt to verify your identity:
 - a. Account Holders: This category of consumer includes our customers which consists solely of entities, corporations, financial institutions, and the like. Because we do not sell our product to the individual consumer, no verification is required.
 - b. Non-Account Holders: This category of consumer includes individuals for whom we have personal information such as a name, phone number, email address employer, etc. only because of their relationship with our customer/account holder. Since this type of consumer is unknown to us, we cannot verify your identity to a reasonably high degree of certainty as required in Section 999.325 of the CCPA, therefore, we will assume you are who you say you are.

Also, in some instances, such as a request to delete personal information, we may first separately confirm that you would like for us to in fact delete your personal information before acting on your request. Such confirmation may involve information specific questions or direct contact by our Director of Security or designee.

2. We will respond to your request within thirty-five (35) days. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.
3. In some cases, our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention

reasons, compliance with regulatory or legal requirements, listed below, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

4. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
 - a. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
 - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
 - c. Debug products to identify and repair errors that impair existing intended functionality;
 - d. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
 - e. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
 - f. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
 - g. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
 - h. Comply with a legal obligation; or
 - i. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

9. Our Opt-In/Opt-Out Policy

- a. By providing an email address on the SMA Sites or Services, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service-related notices, or to provide you with information about our events, invitations, or related educational information.
- b. For purposes of this Privacy Policy, "opt-in" is generally defined as any affirmative action by a User to submit or receive information, as the case may be.
- c. We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.
 2. At any time, you can contact us through privacy@smatechnologies.com or the address or telephone number provided in Section 17 below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Information.
- d. Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service-related notices.

10. About cookies

- a. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- b. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- c. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookies that we use

- a. We use cookies for the following purposes:
- b. authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- c. status - we use cookies to help us to determine if you are logged into our website;
- d. personalization - we use cookies to store information about your preferences and to personalize the website for you;
- e. security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- f. advertising - we use cookies to help us to display advertisements that will be relevant to you;
- g. analysis - we use cookies to help us to analyze the use and performance of our website and services.

12. Cookies used by our service providers

- a. Our service providers use cookies, and those cookies may be stored on your computer

when you visit our website.

- b. We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.
- c. We publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behavior on our website and on other websites across the web using cookies. This behavior tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests (but we do not publish interest-based advertisements on our website). You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>. You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org>. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>.

13. Managing cookies

- a. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 - 1. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
 - 2. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 - 3. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 - 4. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 - 5. <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
 - 6. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- b. Blocking all cookies will have a negative impact upon the usability of many websites.
- c. If you block cookies, you will not be able to use all the features on our website.

14. Protecting Personal Information

- a. SMA maintains administrative, technical, and physical safeguards designed to protect the user's Personal Information and other information against accidental, unlawful, or

unauthorized destruction, loss, alteration, access, disclosure, or use. For example, we and/or our service providers use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Information.

- b. Although we take reasonable steps designed to protect your Personal Information, please be advised that no security system or means of transmitting data over the Internet can be guaranteed to be entirely secure (including without limitation with respect to computer viruses, malicious software, and hacker attacks). We cannot and do not guarantee or warrant the security of your Personal Information or any information you disclose or transmit to us. We are not responsible for the acts of those who gain unauthorized access, and we make no warranty, express, implied, or otherwise, that we will prevent such access, and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of Personal Information that may affect you so that you can take the appropriate actions.
- c. For your own privacy protection, we urge you to keep all passwords confidential. We also recommend that you do not include sensitive information such as passwords, social security numbers or payment information, in any emails that you send to us. If you become aware of any breach of the terms of this Privacy Policy or of the security of the Services, please notify us by email at privacy@smatechnologies.com.

15. Children's Privacy

- a. The Sites and Services are not designed or intended to be used by anyone under the age of 16. If you are under the age of 16 (or a minor in the jurisdiction in which you are accessing our Sites or Services), do not use the Services, or make purchases via the Services, use any interactive features of the Services, or post any Personal Information to our Sites or submit any Personal Information via the Services. We do not knowingly or intentionally gather Personal information about children who are under the age of 16. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us privacy@smatechnologies.com. If we learn that we have inadvertently collected the Personal Information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible and cease the use of that information in accordance with applicable law.

16. Direct Marketing and Do Not Track Signals

- a. SMA does not track its users over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.
- b. California residents are entitled to contact us to request information about whether we have disclosed Personal Information to third parties for the third parties' direct marketing purposes. Under the California "Shine the Light" law, California residents may opt-out of our disclosure of Personal Information to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Information with third parties for marketing purposes. To make such a request you should send (a) an email to privacy@smatechnologies.com with the subject heading "California Privacy Rights," or (b) a letter addressed to SMA Technologies, Attention: 1201 Fannin Street, Suite 202, Houston, TX, USA 77002. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

17. Our details

- a. Our principal place of business is at 1201 Fannin Street, Suite 202, Houston, TX, USA 77002.
- b. You can contact us:
 1. by post, to the postal address given above;
 2. using our website contact form;
 3. by telephone, on the contact number published on our website; or
 4. by email, using the email address published on our website.

18. Data protection officer

Our data protection officer's contact details are to the postal address given in Section 17 above.