

ViralTrak Privacy Policy

Last Revision: April 13, 2020

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Thank you for visiting www.viraltrak.com (the “Website”) or for using our mobile application(s) (the “Mobile App”), each provided by Sqwirrel, LLC (as defined below), and collectively forming the “Platform”. This privacy notice discloses the privacy practices for the Platform.

This Privacy Policy governs our collection, sharing and use of non-personally identifiable information (“Non-Personal Information”) or Personally Identifiable Information through the mobile application ViralTrak. This Privacy Policy also governs the personally identifiable information (“Personal Information”) collected by ViralTrak through our websites at www.viraltrak.com (the “Website”). ViralTrak does not intentionally collect or process the personal data of individuals in the European Economic Area unless you expressly provide information to us through the Mobile App or Website. If you are visiting the Website from the European Economic Area or are using the Mobile App within the European Economic Area, in addition to the other terms of this Privacy Policy, please see the section below entitled **Individual Rights on Data Collection for European Economic Area / European Union (EU)**.

Consent

By using the ViralTrak Mobile App or Website and opting-in to share data with mobile apps in our network, you’re consenting to this Privacy Policy. We share opt-out instructions below.

By expressly acknowledging this Privacy Policy, using the Website and/or continuing to use the Mobile App and opting into data collection, you are expressly consenting to the collection and use of data as set forth in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you should not install the Mobile App or should uninstall the Mobile App immediately, or you may opt-out of data collection through one of the methods listed below. Your use of the Mobile Product shall constitute your acceptance of the terms of this Privacy Policy.

By downloading and installing the Mobile App or visiting our Websites, you agree to the terms of this Privacy Policy with respect to your use of our Mobile App or Websites and any Personal Information that you may provide to us through the Mobile App or Websites. This Privacy Policy will govern our collection, sharing and use of your Personal Information and Non-Personal Information. If you do not agree to the terms of this Privacy Policy, you

should not use our Mobile App or Websites. Your use of the Mobile App or Websites shall constitute your acceptance of the terms of this Privacy Policy.

This Privacy Policy only relates to ViralTrak's collection and use of information through the Mobile App and Websites.

In order for Reveal Mobile to stay current with industry best practices and regulations on privacy and security, we belong to the Mobile Marketing Association's Privacy Committee and the Internet Advertising Bureau's Public Policy Committee. We're also members of the consumer privacy trade group the Future of Privacy Forum, a nonprofit organization that serves as a catalyst for privacy leadership and scholarship, advancing principled data practices in support of emerging technologies.

Reveal Mobile is a member of the Network Advertising Initiative (NAI). Reveal Mobile undergoes an annual NAI compliance review and adheres to the NAI's Code of Conduct. To learn more about the NAI or how to opt out of receiving targeted advertising from other third party services that belong to the NAI, please visit their [website](#).

Data We Collect

SUMMARY

We collect and anonymize location data. We also collect other mobile device details, and data when you use the Mobile App and visit the Website, such as browser information.

Mobile App

Precise Location Data – By opting in to share your location data, the Mobile App allows us to collect information regarding your location, or the location of your device, by using GPS coordinates provided by your mobile device. The Mobile App will also indicate if you come within proximity of a Bluetooth Low Energy (BLE) device such as a beacon, and the amount of time you spend in proximity to the beacon. The GPS coordinates and beacon information are collectively referred to herein as "Location Data." When our Mobile App is open on your mobile device, we periodically receive Location Data. We may also enable collection of background location data when the app is not in use, which enables us to also receive this Location Data. Most GPS-enabled mobile devices can identify a user's location to within less than 50 feet.

Automatically Collected Information; Other Non-Personally Identifiable Information. When you opt-in to data sharing while using our Mobile App by agreeing to share location, our web server automatically collects limited information about your device. ViralTrak logs non-personally-identifiable

information including the mobile advertising ID (IDFA / AdID), IP address, SSID/BSSID, the type of mobile device you use, the IP address of your mobile device, and your mobile operating system. We do not store IP address or SSID/BSSID data for residents of the EU. If you opt-out of location sharing, the Mobile Product sends no information to ViralTrak.

- **International Data Collection** – ViralTrak stores and processes information collected from our SDK and data feeds in the United States. For people residing outside of the United States, by using our Mobile App with our SDK inside, you are agreeing to the transfer of information to the U.S. and the use of your data as identified in this Privacy Policy. You should be aware that the U.S. rules and regulations governing collection and use of data may differ from the country in which you currently reside.

Website

- **Information you Provide.** You are not required to register or provide any Personal Information in order to browse our Website and learn more about our company, our products and our technology. However, if you request or download any white papers or other information or sign up for our newsletter, you will be required to provide certain limited Personal Information such as your name or email. We will use such information to confirm and deliver your request to you. We do not share this Personal Information with any third party, other than our service providers if necessary, to fulfill your request, or as otherwise described in this Privacy Policy. For example, if you sign-up for our newsletter, we may provide your Personal Information to our service provider that manages and delivers our newsletters.
- **Browser-Level Information:** When you browse our Website, our web server automatically collects limited information about your computer configuration or device or, such as the type of browser software you use and the operating system you're running and your IP address.
- **ViralTrak Mobile App logs non-personally-identifiable information** including IP address, profile information, browser type, browser language, referring / exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, from users and visitors to the Website and the type of mobile device you use, the IP address of your mobile device, your mobile operating system, and the type of mobile browsers you use. This data is used to manage our Website, including diagnosing problems with our Website, track usage and improve the Website. User IP addresses are recorded for security and monitoring purposes.

Privacy of Children

SUMMARY

ViralTrak does not knowingly collect any Personal Information from anyone under the age of 13.

Protecting the privacy of children is especially important. For that reason, ViralTrak does not knowingly collect any Personal Information from anyone under the age of 13. In no other way do we knowingly collect or maintain personally identifiable information from persons under 13 years of age, and no part of our Mobile App is directed to persons under 13. If ViralTrak learns that Personal Information of persons under 13 years of age has been collected through its Website or Mobile App, then ViralTrak will take the appropriate steps to delete this information and to flag the device to prevent any future data collection.

Disclosure and Sharing of Information and Data Retention

SUMMARY

We collect data for various reasons, and share with select partners, and may store it for up to 5 years. We discard any EU data inadvertently received.

Information about our customers is an important part of our business. We do not rent, sell, or share your Personal Information collected via the Mobile App or Websites other than as described in the Privacy Policy.

- We may disclose your Personal Information to our service providers who work on behalf of ViralTrak, including to provide our Website with services or to fulfill user requests. However, these companies are not allowed to share this information or to use it for their own purposes.
- For international users, we transfer Personal Data into the United States on the basis of the EU-US Privacy Shield Framework. This data is passed to third parties such as Google, Salesforce, and Hubspot, and is based upon consent from the end user.
- We may add additional data to the existing data collected about your device, such as appending non-personally identifiable US Census data to the device.
- We may disclose non-personally identifiable information, including your IP address and as part of an aggregate data set to third parties for the purposes of providing targeted advertisements and information our advertising partners believe may be of relevance and interest to you.

- We may disclose your data to comply with legal requirements or to respond to a subpoena, search warrant or other legal process or government request received by ViralTrak, whether or not a response is required by applicable law.
- We may disclose your personal information to enforce our rights in our Mobile App and/or Websites or to protect the rights, property or safety of members of the ViralTrak community, the public, or ViralTrak and its employees.
- As our business grows, we may buy or sell various assets. In the event that ViralTrak or some or all of our assets are acquired by another company, information about our users may be among the transferred assets.
- In the event that ViralTrak goes through a bankruptcy, reorganization, receivership or similar event, you understand and agree that we may not be able to control how your Personal Information or Location Data collected by us is treated, transferred or used.
- Please keep in mind that whenever you voluntarily make your Personal Information available for viewing by third parties on any part of our Mobile App or Websites, that information can be seen, collected and used by anyone who visits the site. We cannot control and therefore cannot be responsible for any unauthorized third-party use of such information. Please respect the privacy of others by not posting their personal information on our site without their permission.

ViralTrak does not retain any European Economic Area/European Union (EU) data from our Mobile App. Should we receive any EU data either from our SDK or a data feed, that data is immediately discarded and never processed. ViralTrak transfers personal data that is provided by end users when they enter this data into our Mobile App or Website for the purposes of utilizing the Mobile App services. This data is collected and stored by Google, Salesforce, and Hubspot, and may be retained for so long as it remains useful in connection with sending marketing and sales material.

Unless we receive an opt-out request (as discussed below), ViralTrak stores the non-personally identifiable information about your device for up to five years as long as that device remains active within our servers for 180 days. If the device is inactive for a period of greater than 180 days, we purge all data on this device.

If you provide Personal Information to us through our Mobile App or Website, such as signing-up for our newsletter, you may request that we delete such Personal Information from our system, by sending a request to

optout@viraltrak.com. We will promptly cease use of any such Personal Information and will remove such Personal Information from our servers in accordance with our standard practices, but within at least two weeks.

Certain non-personally identifiable information relating to your use of the Mobile App or Website may be retained for so long as it remains useful in connection with improving our Website and/or Mobile App.

All data collected or received by ViralTrak is securely stored and processed in the United States.

Data Security

SUMMARY

We follow industry best-practices to secure data.

ViralTrak has taken steps to protect the confidentiality of the data it collects from users of its Mobile App or Website. Information we gather on ViralTrak is stored within ViralTrak controlled databases (or databases hosted on our behalf) on servers maintained in protected environments, and we limit access to such information to ViralTrak employees who we believe need to see that information to provide you with services or otherwise do their jobs. However, no physical or electronic security system is impenetrable, and we cannot guarantee the security of our servers or databases, nor can we guarantee that the information that you supply to us won't be intercepted during transmission over the Internet.

Opt-in Services

SUMMARY

We only collect opted-in data, and work with our customers to ensure privacy compliance. We discard any EU data inadvertently received.

ViralTrak and the Mobile App is an opt-in service only. When you download the Mobile App and choose to share your device's location, you are opting in to this service.

Mobile applications on Apple devices, like iPhones, and Android/Google devices, like Samsung Galaxy, ask for permission to collect data in different ways. Older Android phones running older Android operating systems require you to accept any permissions that the app asks for before you can install the app. If you downloaded the app, you've opted in. Newer Android phones allow you to opt-in or out of location sharing after downloading the app.

Apple apps allow you to download the app, but then to opt in or out of sharing location, Bluetooth settings, and certain advertising settings on your device's Settings > General pages.

Our Mobile App provides access to the information in this Privacy Policy prior to collecting any data and to secure your consent to the collection of your data as set forth herein.

Individual Rights on Data Collection for European Economic Area/European Union (EU)

Effective May 25th, 2018, ViralTrak does not offer its goods or services to individuals within the EU and does not collect, process or store any personal data from the European Union market area for the purposes of building segments for interest-based advertising within the Mobile Product. If ViralTrak inadvertently receives personal data from within the EU from the download of our Mobile App, as verified by examining the lat/long coordinates received, ViralTrak immediately discards that data and does not store or analyze it.

ViralTrak stores personal data that is directly provided by end users when they enter this data into our Mobile App or Website for the purposes of receiving marketing collateral or email newsletters. When you provide this data, ViralTrak will present you with explicit and informed consent to sharing data, and by providing this data you expressly consent to its use as set forth in this Privacy Policy. The data entered into our Mobile App or Website is collected by ViralTrak and shared with Google, Salesforce, and Hubspot in order to provide the requested marketing collateral and e-mail newsletters.

Subject to applicable law, you may have additional rights regarding the processing of your data.

- The right to access your data, or to request copies of it, subject to verification
- The right to request corrections to your data
- The right to request deletion or restriction of your data
- The right to object to data collection
- The right to transfer your data to another data controller
- The right to file a complaint with the appropriate Data Protection Authority regarding the processing of your data

ViralTrak contracts with the following firm to serve as our Data Protection Officer and EU Designated Representative:

External Data Protection Officer
ePrivacy GmbH
represented by Prof. Dr. Christoph Bauer
Große Bleichen 21, 20354 Hamburg

For all request concerning the security of your data you can contact our data protection officer at privacy@viraltrak.com.

EU-US Privacy Shield Framework

SUMMARY

ViralTrak undergoes annual self-certification for the EU-US Privacy Shield Framework.

ViralTrak complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. ViralTrak has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

ViralTrak's End User and Website Privacy Policy describes the types of personal data collected, the purposes for which it collects and uses personal information, the type or identity of third parties to which it discloses personal information, and the purposes for which it does so, the right of individuals to access their personal data, the choices and means the organization offers individuals for limiting the use and disclosure of their personal data, and the requirement to disclose personal information in response to lawful national security or law enforcement requests. ViralTrak is responsible for the processing of the personal information it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. ViralTrak complies with Privacy Shield Framework for all transfers of personal data from the EU. ViralTrak may be liable under the Privacy Shield Framework if a third-party processes personal information in a way inconsistent with the Framework, unless ViralTrak proves it is not responsible for the event giving rise to damage.

As it pertains to the personal information received or transferred pursuant to the Privacy Shield Framework, ViralTrak is subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to ViralTrak's compliance to the Privacy Shield Framework.

ViralTrak commits to refer unresolved Privacy Shield complaints to the EU Data Protection Authorities (DPA). If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit the EU DPA for more information or to file a complaint. The services of the EU DPA are provided at no cost to you.

ViralTrak commits to cooperate with the panel established by the EU data protection authorities and comply with the advice given by the panel with regard to data transferred from the EU.

In compliance with the Privacy Shield Principles, ViralTrak commits to resolve complaints about our collection or use of personal information. If your complaint is not resolved, you may have the right, under certain limited conditions, to invoke binding arbitration before the Privacy Shield Panel of the U.S. Department of Commerce.

Residents of the European Union with inquiries or complaints regarding our Privacy Shield policy should first contact ViralTrak at: **privacy@viraltrak.com**

Varchasvi Shankar, President/CEO
ViralTrak, 300 Enterprise Court, Bloomfield Hills, MI 48302

Because the Mobile App and Websites are evolving mediums, we may need to change our Privacy Policy at some point in the future, in which case we'll post the changes to this Privacy Policy on our Website and/or within the applicable Mobile App and update the Effective Date of the policy to reflect the date of the changes. Unless a material change to the Privacy Policy is made, by continuing to use the Mobile App after we post any such changes, you accept the Privacy Policy as modified.