

## **PRIVACY POLICY**

### **SCHEDULE "B"**

#### **AGI SureTrack Ltd.**

Last Updated: 2020/05/25

AGI SureTrack Ltd. ("AGI", "SureTrack", "the Service Provider", "we," "us," or "our" and formerly "Affinity Management Ltd."), is committed to informing you about its practices regarding personally identifiable information you may provide us in connection with your use of the COMPASS software and related software and services (the "Software"). We believe it is important for you to know how we treat your personally identifiable information collected via the Software. This Privacy Policy ("Privacy Policy") governs the manner in which we collect, use, maintain and disclose information collected from you when you use the Software. YOU SIGNIFY YOUR ASSENT TO THIS PRIVACY POLICY BY USING THE SOFTWARE. PLEASE DO NOT ACCESS OR USE THE SOFTWARE OR USE ANY OF OUR PRODUCTS OR SERVICES IF YOU DO NOT AGREE TO THIS PRIVACY POLICY.

#### **THE INFORMATION WE COLLECT**

**Information You Give to Us.** The personally identifiable information ("Personal Information") collected on or through the Software can include some or all of the following: name, address, telephone number(s), email addresses, text messaging information and other contact information associated with electronic or digital messaging methods, vehicles and interaction, payment information, demographic information, and any other information or content you may voluntarily provide all of which may concern you or your clients.

**Information We Collect Automatically.** Whenever you access or use the Software, we may automatically receive and record information from the computer or mobile device you are using to access the Software, which may include: the device you use to access or use our products and services, your IP address, the type of browser or application you are using to access our products and services, the identity of the page or feature you are requesting, referring and exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit, and number of clicks (collectively, "Non-Identifiable Data"). We also collect information through the use of cookies, web beacons, and other technology. See the section labeled "Tracking Technologies and Do Not Track Signals" below for more details.

#### **USE OF INFORMATION**

We may use your Personal Information:

- to understand your use of the Software and to make improvements to our Software and our other products and services (including, without limitation, any other existing and future products and services);
- to fulfill our service offerings;
- to respond to specific requests from you;
- to provide tailored information and features regarding your use of the Software;

- to provide any necessary notices to you if situations prompt such notification;
- to protect the security or integrity of the Software if necessary;
- to administer the Software in general, and
- to promote and market our product and services and our related sponsors, partners and businesses, and various products and services and to assist in the business planning, marketing, advertising and sales efforts of the foregoing parties.

Information collected from you may also be used to ensure compliance with certain terms and conditions and agreements entered between you and us as well as to prevent unauthorized use or disclosure of content downloaded or otherwise accessed via the Software.

**Non-Identifiable Data.** We may use and share Non-Identifiable Data (e.g. non-personal, de-identified information that can't be used to identify you) with third parties for any lawful business purpose without any obligation or accounting to you. When we do so, we will take reasonable measures to ensure that the Non-Identifiable Data is not personally identifiable and cannot later be used to identify you.

## **MARKETING COMMUNICATIONS**

We may communicate with you through email and notices via the Software. These may include a series of welcome emails which help inform new Users about various features of the Software, emails and confirmations regarding actions taken by you on the Software, and notices relating to the proper functioning of the Software or your account. We may use your Personal Information to send you promotional information, products and services offered by third parties that we feel may be of interest to you. The Personal Information you provide will allow us to alert you to new developments, features and enhancements, special offers, upgrade opportunities, news and general offers. We strive to limit use of the information you provide to those offers that we think you would appreciate receiving. We may send you electronic communications via email or the Software that may contain information regarding third-party products or services; however, this doesn't mean that we've traded your Personal Information to any party.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We will only share or disclose your personal information for the purposes described below:

**With Your Consent.** We may share your Data, which includes personal information, when we have your consent. You can revoke your consent at any time by providing notice to us at [compassprivacy@agisuretrack.com](mailto:compassprivacy@agisuretrack.com).

**Service Providers.** We may share Personal Information collected through your use of this Software with our partners and affiliates. Additionally, we may engage service providers to perform various functions relating to the Software, and those service providers may have access to your Personal Information in order to perform those functions. Unless we tell you differently, they do not have any right to use your Personal Information beyond what is necessary to assist us.

**For our Protection.** We may also disclose your personal information at the request of law enforcement or government agencies or in response to subpoenas, court orders, or other legal process to establish,

protect, or exercise our legal or other rights or to defend against a legal claim or as otherwise required or allowed by law. We may disclose your personal information in order to protect the rights, property, or safety of a user or any other person. We may disclose your personal information to investigate or prevent a violation by you of any contractual or other relationship with us or your illegal or harmful activity.

**Business Transfers.** In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your personal information may be among the assets transferred. Any acquirer of our assets may continue to process your personal information as set forth in this Privacy Policy.

## **REMOVAL, SHARING AND REVISION OF PERSONAL INFORMATION**

If your Personal Information changes, or if you no longer desire to receive non-account specific information from us, we will endeavor to provide a way to correct, update and/or remove your previously provided Personal Information. This can be done by emailing a request to us at [compassprivacy@agisuretrack.com](mailto:compassprivacy@agisuretrack.com) or using the functionality contained in the Software (if any). Additionally, you may request access to your Personal Information as collected by us by sending a request to us as set forth above. Otherwise, we will retain your Personal Information for as long as your account and use of the Software remain active and for a period of time after that in order to provide you with the unique functionality of the Software.

## **PERSONAL INFORMATION, DISCLOSURE, OPT-OUT**

You always have the option to opt-out of having your Personal Information disclosed by us to third parties that are not our agents or service providers. If you would like to opt-out of such further disclosures or direct marketing, please contact us at [compassprivacy@agisuretrack.com](mailto:compassprivacy@agisuretrack.com) or use the opt-out mechanisms (if any) contained in the Software. Please note that, even if you so opt-out, your Personal Information may still be disclosed to third parties to the extent that you affirmatively provide it to third parties using the Software (e.g., by posting it using functionality in the Software).

## **TRACKING TECHNOLOGIES AND DO NOT TRACK SIGNALS**

The Software uses cookies and web log files to track usage. A cookie is a tiny data file that resides on your device web browser that allows us to recognize you when you use the Website using the same web browser. Like the information you enter during account registration, cookie and log file data is used to customize your experience using the Software. One type of cookie, known as a "persistent" cookie, is set once you have logged in to the Software. The next time you use the Software, the persistent cookie will allow us to recognize you so you will not need to log in before using the Software. Another type of cookie, called a "session" cookie, is used to identify a particular session with the Software. Session cookies expire after a short time or when you close the Software. You can choose to disable cookies, however this will prevent you from utilizing certain functionality of the Software. We do not recognize "do not track" signals.

## **PROTECTION OF PERSONAL INFORMATION**

The Personal Information we collect from you is protected using industry standard security measures. In order to secure your Personal Information, access to your data is password-protected, and sensitive data is protected by SSL encryption when it is exchanged with the Software. However, no security measures are perfect or impenetrable, and we cannot guarantee that the information submitted to, maintained on or transmitted from our systems will be completely secure. We are not responsible for the circumvention of any privacy settings or security measures contained on the Software by other users or third parties. As such, we recommend that you use caution whenever submitting Personal Information online. In the event you include your Personal Information as part of content that you post or upload to the Software, such information may be made available to any parties using the Software and/or such content. We may, but do not have the obligation to, edit or otherwise remove such information from the content before it is posted on the Software. If you do not wish to have your Personal Information made available in this manner, you must remove any such information from your content before posting. Your contact information (which may include, without limitation, your username and email address) may be included with any content that you post via the Software. We are not liable for any damages caused or incurred due to Personal Information made available in the foregoing manners.

In the event of a data breach, natural disaster, or other unforeseen event that causes your Data to be deleted or compromised, we will notify you by email or as required by law.

#### **INTERACTION WITH OTHER SERVICES**

The Software may contain links to other applications, websites, and services that we may not own or operate. We cannot control, nor are we responsible for, the privacy practices or content of external services and applications. We encourage you to read the privacy statements of each and every external application, website and or service that collects Personal Information from you. This Privacy Policy applies solely to Personal Information collected on this Software.

#### **LINKS AND THIRD- PARTY WEBSITES**

We are committed to safeguarding the information you entrust to us and we believe that you should know how we utilize the information we collect from you. Please note that the Software may contain links to other websites, and the Software may allow you to download or otherwise access content and data (including software), controlled by third parties. We are not responsible for the privacy practices of these or any other websites, content, or data controlled or provided by third parties and you access and utilize such content, data, and websites entirely at your own risk and expense. We strongly recommend that you review the privacy and other practices governing any other websites that you choose to visit and any content or data you wish to download or otherwise access.

#### **PRIVACY POLICY EFFECTIVE DATE AND NOTICE OF CHANGES**

This Privacy Policy was last updated as of the date written above. We reserve the right to change, modify, add or remove portions of this Privacy Policy at any time and at our sole discretion by posting such changes to this page. We will post a notice of modifications to this Privacy Policy and will notify you through your account and by email, however, you agree to periodically check this Privacy Policy for such changes. Changes will become effective immediately but will not apply retroactively. If you do not agree to the modified Privacy Policy, you should immediately discontinue your use of the Software and our

products and services. If we decide to use your Personal Information in a manner different than first communicated, we will notify you by email. In the event that we go through a business transition, such as a merger, another company acquires us or our affiliates, or we sell a portion of our assets, your Personal Information will, in most instances, be part of the assets transferred. We will endeavor to inform you of any exchange and its effects via notice on our Software. If as a result of a business transition, your Personal Information will be used in a manner different from that stated at the time of collection, you will be given the choice to opt out.

## **CONTACT**

If you have any further questions concerning the Privacy Policy and the use of your Personal Information, please contact us at [compassprivacy@agisuretrack.com](mailto:compassprivacy@agisuretrack.com)