



## **Privacy Policy**

CompanyTRAK utilizes www.CompanyTRAK.com (the “Website”) or for using our mobile application(s) (the “Mobile App”) and Bluetooth tags and locators (the BT tracker), each provided by CompanyTRAK, LLC (“**Company**”, “**we**” or “**us**”) (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 Platform.

### **1. Consent**

By using the Platform and opting-in to share data, you are consenting to this Privacy Policy. We share opt-out instructions below.

If you do not agree to the terms of this Privacy Policy, you should not use this Platform. Your use of the Platform shall constitute your acceptance of the terms of this Privacy Policy.

This Privacy Policy only relates to CompanyTRAK’s collection and use of information through the Platform.

### **2. Data We Collect**

Platform collects information for the Client regarding its employees or consultants for Contact Tracing and Social Distancing solutions. The Platform collects data for various reasons and may store it as long as your account remains in existence and for such period thereafter as required under any law for the time being in force. Information about our customers is an important part of our business. All data collected or received by the Platform is securely stored and processed in the United States. We will not disclose this information to any third party unless otherwise required by law.

### **3. Services Overview:**

Client will use CompanyTRAK for their employees or consultants (“Users”) for Contact Tracing and Social Distancing for virus pandemics for the benefit of Client and its employees or consultants. Human Resources (HR) or Authorized employee (“Client Admin”) will be provided or assigned access to the CompanyTRAK Portal with master admin access. This enables Client Admin to customize locations, geofence buildings, assign additional admins, manage employees, customize daily questionnaire, and view reporting. Client Admin will have the access to maintain and edit Users and the status of Users. When Client Users who are in CompanyTRAK enter a geofenced building, CompanyTRAK follows and logs interaction of Client’s Users. CompanyTRAK uses multiple technologies to provide Contact Tracing and Social Distancing. A combination of mobile location services (GPS) and BLE technologies along with BT tags and scanners are used to track primary exposure and notifies Client Admin when a client User self-reports with symptoms or with positive test results. Either prior to, or as entering the geofenced building, Client Users would (voluntarily) answer the Client customized daily questionnaire. This can include Temperature, Personal Protective Equipment (PPE) required and/or a set of daily questions. Once answered, the responses are sent to Client Admin, for reporting purposes and the solution starts to track and log the Users interactions. If the User updates the questionnaire with any symptoms or answers with any assigned “negative” answers, they will be directed to Client Admin for further next steps. If Users come within the 6-foot proximity of each other, it is logged as a contact. If any of the User

report symptoms or a positive test for virus in the next 14-18 days, a notification is sent to Client Admin about a possible risk of exposure so Client Admin can take appropriate next steps as per Client policy. If a User recovers from the virus, Client Admin will have the ability to reset the User status as “Safe” after receiving their updated test results. All users who are authorized by Client to access Client database shall be employees or agents of Client or its Affiliates and their use of CompanyTRAK shall be within Client’s control. While CompanyTRAK has several functionalities, the SOW will be defined as a part of this Agreement will detail the service(s) the Client has subscribed to with CompanyTRAK.

#### **4. Data Security, Rights and Grievance**

We follow industry best-practices to secure data.

- a. The Platform has taken steps to protect the confidentiality of the data it collects from users and is stored within the Platform controlled databases (or databases hosted on our behalf) on servers maintained in protected environments, and we limit access to such information on the Platform to 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.
- b. For any concerns or questions in relation to the Privacy policy, you may address to Compliance officer @ Legal@CompanyTRAK.com.

#### **5. Business Transfers:**

As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution, similar event, or steps taken in anticipation of such events (e.g., due diligence in a transaction), all collected information including your user information may be part of the transferred assets.

#### **6. Agents, Consultants, Vendors and Related Third Parties:**

CompanyTRAK, like many businesses, sometimes hires other companies to perform certain business-related functions on its behalf, and we may provide access to or share your information with these companies, so they can perform services for us. Examples of such functions include data storage, security, fraud preventions, payment processing, legal services, and maintaining databases.

#### **7. Legal Requirements:**

CompanyTRAK may access, disclose, transfer and preserve your information when we have a good faith belief that doing so is necessary to: (i) comply with the law including with subpoenas, search warrants, court orders, and other legal process; and respond to inquiries or requests from government, regulatory, law enforcement, public authorities, or content protection organizations; (ii) protect and defend the legal rights, privacy, safety or property of CompanyTRAK, its affiliates, subsidiaries, employees, agents, contractors, or its users; (iii) permit us to pursue available remedies, commence, participate in, or defend litigation, or limit the damages we may sustain; or (iv) enforce this Privacy Policy or any applicable Terms of Service, or any other agreement or terms or conditions, terms of sale, or other applicable agreement with you.

#### **8. Security**



CompanyTRAK has implemented technical and organizational security measures to protect the Personal Data provided via the App from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. For example, limiting access to information only to employees and authorized service providers who need to know such information for the purposes of this Privacy Notice. However, no Internet or email transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us or authorize to be sent to us.

#### **9. Retention of your information**

We will only retain the information to the extent permitted or required by applicable laws.

If you wish to withdraw from further use of the App and so advise us of your decision, it may take up to 90 days from the beginning of the deletion process to remove your information from our systems and records.

Because the Platform is evolving medium, 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 Platform 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 Platform after we post any such changes, you accept the Privacy Policy as modified.