

## **Arfiti Mobile Application Privacy Policy**

Last Revised: July 31, 2019

This Mobile Application Privacy Policy (the “Policy”) covers the collection, use, and disclosure of Personal Information (as defined below in “What We Collect and How We Collect It”) that may be collected by Robots and Pencils, LP (collectively with its subsidiaries, “Robots and Pencils,” “the Company,” “we,” “us,” and “our”) through the Arfiti mobile application (“Arfiti” or “the App”). We respect your privacy and are committed to protecting your privacy through our compliance with this Policy. This Policy should be read in conjunction with our App Terms of Use, into which this Policy is incorporated by reference.

This Policy describes:

- The types of information we collect from you or that you may provide when you download the App.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this Policy carefully to understand our practices regarding your Personal Information and how we will treat it. If you do not agree with our policies and practices, then please do not use our App. By using our App, you agree that you have read and accepted our privacy practices, as described in this Policy. This Policy may change from time to time (see below, “Changes to this Policy”). Your continued use of the App after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### **What We Collect and How We Collect It**

To ensure that we provide you with the best possible experience, we will store, use, and share Personal Information about you in accordance with this Policy. The App is designed to collect and use very little information, enabling you to contribute posts throughout your community. We may collect Personal Information from users of our App that:

- you provide to us
- you include in content you submit to, or post within, the App, and
- is automatically collected by the App.

### *Information You Provide to Us*

“Personal Information” is any information that can be used to individually identify you from a larger group, such as data including, but not limited to, your:

- username,

- email address,
- date of birth,
- profile avatar image,
- photos and images you share, and
- your location.

You may provide us Personal Information when you:

- register yourself with the App,
- request information, or
- contribute posts to the App.

The information that you provide in each case will vary. In some cases, we may ask you to create a username and password that should only be known to you. In addition, the App makes use of your device's camera to scan your surrounding area and collect information about that area so that you can contribute posts. Please be aware that you are providing information, some of which may be Personal Information, when you scan your area. Always be aware and mindful of your surroundings when you use our App.

### *Automated Information Collection*

In addition to the information that you provide to us, we may also collect information about you and your device during your use of our App. We collect this information using automated tools. When you download, access, and use the App, the App may also use technology to collect information in the following categories:

- Usage Details. When you access and use the App, we may automatically collect certain details about your access to and use of the App, including location data, any App screens accessed (i.e., "Profile," "Search in Your Area," and "AR Session"), and possibly application activity logs.
- Device Information. We may collect information about your mobile device and internet connection, including your device's IP address, operating system, mobile network, or carrier information.
- Location Information. The App collects and locally stores real-time information about the location of your device through a "use current location" feature. This information is collected at the street-level by the Company.

If you do not want us to collect this information, please do not download the App or, if you have already downloaded the App, please delete the App from your device.

## *Information Collection Technologies*

**Cookies.** A “cookie” is a small data file transmitted from an app to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use both of them:

- (1) session cookies, which do not stay on your device after you close your app, and
- (2) persistent cookies, which remain on your device until you delete them or they expire.

Of course, if you do not wish to have cookies on your device, it might be possible to refuse to accept mobile cookies by activating the appropriate setting on your device. However, by disabling cookies on your device, you may be prohibited from full use of the App’s features or lose access to some functionality.

### **Do Not Track Disclosure**

Other than as disclosed in this Policy, the App does not track users over time or across third-party apps or services to provide targeted advertising. Therefore, the App does not operate any differently when it receives Do Not Track (“DNT”) signals from your internet web browser.

### **Your Choices and Selecting Your Privacy Preferences**

We want to provide you with relevant information that you have requested.

If we ever provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Any transactional or service-oriented messages are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

We may send you email newsletters and marketing emails if you consent to receive such marketing information. After you request to receive these emails, you may opt out of them at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

While using the App, you will have the opportunity to receive notifications from the App through “push notifications.” You can choose whether to enable or disable this feature, as well as which, if any, specific push notifications you want to receive (such as when someone discovers your post or when you are in proximity to a post). You can also choose to receive notification in specific geographic locations. To select your preferences, please visit the “Profile” section of the App.

Any communications you receive from us will be administered in accordance with your preferences and this Policy.

### **Accuracy and Access to Your Personal Information**

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

To view and change the Personal Information that you have provided to us, you can visit the “Profile” section of the App and follow the instructions on that screen, or contact us directly for assistance.

### **Information of Minors**

We do not intentionally seek to gather information from individuals under the age of thirteen (13) in the United States and sixteen (16) in the European Union (collectively, “Minors”). We do not target the App to Minors, and would not expect them to be engaging with our App or services. We encourage parents and guardians to provide adequate protection measures to prevent Minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about Minors, we will take steps to securely remove it from our systems.

### **How We Use Your Information**

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- Assisting you with items such as personalized experiences, facilitation of product usage, and enforcement of Terms of Use.
- Preventing malicious activity and providing you with a secure experience.
- Providing service and support for services you request.
- Providing marketing communications that are effective and optimized for you.
- Keeping you up-to-date with the latest benefits, products, and services available from us.
- Preventing unwanted messages or content.
- Allowing you to participate in our marketing promotions.
- Measuring the performance of our marketing programs.
- Contacting you about services and offers that are relevant to you.

### **How We Share Your Information**

We do not sell or lease your information to any third party. We may disclose your Personal Information to our trusted third-party business partners in accordance with this Policy. We work with a number of partners that help us process your requests, deliver customer service and support, send email marketing communications, and provide experiences that you have come to expect from us. We will share your Personal

Information with these third parties in order to fulfill the service that they provide to us. These third-party partners are under contract to keep your Personal Information secure and not to use it for any reason other than to fulfill the service we have requested from them.

In addition, your use of the App may also provide you with the opportunity to share your Personal Information with other users of the App. Your username and profile avatar image, as well as your posts, may be visible to other users.

California Residents. We will not disclose or share your Personal Information with third parties for the purposes of third-party marketing to you without your prior consent.

Except as described in this Policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Responding to duly authorized information requests from law enforcement or other governmental authorities.
- Complying with any law, regulation, subpoena, or court order.
- Investigating and helping prevent security threats, fraud, or other malicious activity.
- Enforcing or protecting the rights and properties of Robots and Pencils or its subsidiaries.
- Protecting the rights or personal safety of Robots and Pencils' employees.

#### **Sharing In Connection with Business Transactions:**

There are circumstances where we may decide to buy, sell, or reorganize our business, in whole or in part. Under these circumstances, we may share, sell, or transfer Personal Information to prospective or actual successors, related entities, partners, and affiliates. In such circumstances, we will ensure your information is used in accordance with this Policy.

#### **Third-party Websites and Apps**

This Policy does not apply to apps, websites, or other domains that are maintained or operated by third parties or our affiliates ("Linked Sites"). The App may link to Linked Sites, but these links are not endorsements of Linked Sites, and this Policy does not extend to them. Because this Policy is not enforced on Linked Sites, we encourage you to read any posted privacy policy of Linked Sites before using Linked Sites and providing any information.

#### **For App Users Outside the United States**

Users of the App may be located anywhere around the world. We store, process, and transmit information within the United States and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy. If you are located in the European

Union, Canada, or elsewhere outside the United States, please be aware that any Personal Information you provide to us will be collected within the United States. By using the App, participating in any of our services, and/or providing Robots and Pencils with your information, you consent to this transfer.

### **For App Users in the European Union (“EU”)**

Under the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or “GDPR”), individuals in the EU are afforded specific rights with respect to their Personal Information, or “personal data” as defined under the GDPR. For the purposes of this Policy, the Company operates as a data controller. Any personal data we collect from you is processed in the United States and under the terms of this Policy and any data processing addendums entered into by Robots and Pencils and its trusted third-party partners. One such trusted third party is Amazon Web Services (“AWS”). As part of its own service terms, AWS has incorporated a data processing addendum, to which the Company is a party. To review AWS’s service terms, as well as its data processing addendum, please visit <https://aws.amazon.com/service-terms/>.

Any personal data we collect from you is processed in the legitimate interest of our business and for providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law, and in accordance with your rights below.

You can exercise any of the following rights by notifying us as described below:

- **Access**. You may email us at [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com) to request a copy of the personal data our App databases currently contain.
- **Correction or Rectification**. You can correct what personal data our App database currently contains by accessing your account directly, or by emailing us at [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com) to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause information to be incorrect. Where applicable, we will ensure such changes are shared with trusted third parties.
- **Restrict Processing**. When applicable, you may restrict the processing of your personal data by submitting a request via email to [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com). In your email, please explain how you wish us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.

Where applicable, we will ensure such changes are shared with trusted third parties.

- Object to Processing. When applicable, you have the right to object to the processing of your personal data by submitting a request via email to [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com). When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Portability. Upon request and when possible, we can provide you with copies of your personal data. You may submit a request via email to [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com). When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent. Where applicable, we will ensure such changes are shared with any trusted third parties.
- Withdraw Consent. At any time, you may withdraw your consent to our processing of your personal data through this App by notifying us via email at [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com). Using the same email address associated with your App account, simply type the words “WITHDRAW CONSENT FOR ARFITI” in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- Erasure. If you should wish to cease use of our App and have your personal data deleted from our App, then you may submit a request by emailing us at [hello@robotsandpencils.com](mailto:hello@robotsandpencils.com). Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your personal data has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.
- Submit Complaints or Questions. If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state, you may also lodge a complaint with the supervisory authority in your country.

### **Safeguarding the Information We Collect**

We take reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information and alert us of any suspicious activity.

**Changes to this Policy**

If we make any changes to this Policy, a revised Policy will be posted on this screen and the date of the change will be reported in the “Last Revised” block above. You can get to this page from the App by clicking on the “Privacy Policy” link (usually at the bottom of the Profile screen).

**How to Contact Us**

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us at

[hello@robotsandpencils.com](mailto:hello@robotsandpencils.com)

1.866.515.9897