

RELECURA PRIVACY POLICY

Last Updated June 24, 2020

Welcome to the website (the “**Site**”) of Relecura, Inc. (“**Relecura**,” “**we**,” “**us**,” or “**our**”). Relecura provides a cloud-based technology tracking platform (collectively, including the Site, the “**Service**”).

This Privacy Policy explains what Personal Data (defined below) we collect, how we use and share that data, and your choices concerning our data practices. This Privacy Policy is incorporated into and forms part of our Terms of Service located at <https://tracker.relecura.com/terms>.

Before using the Service or submitting any Personal Data to Relecura, please review this Privacy Policy carefully and [contact us](#) if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Site or otherwise use the Service.

1. PERSONAL DATA WE COLLECT

We collect information that alone or in combination with other information in our possession could be used to identify you (“**Personal Data**”) as follows:

Personal Data You Provide: We collect the following categories of Personal Data from you when you interact with the Service:

- **Identification Data:** We collect your name, email address, phone number, and mailing/billing addresses, and your company’s name (if applicable).
- **Financial Data:** Our payment processor [Stripe, Inc. (“Stripe”)] collects the financial information necessary to process your payments for the Service. Accordingly, in addition to this Privacy Policy and our Terms of Service, your Financial Data is also processed pursuant to [Stripe’s] services agreement and privacy policy.
- **Communication Data:** We may collect information when you contact us with questions or concerns and when you voluntarily respond to questionnaires, surveys or requests for market research seeking your opinion and feedback. Providing communication data is optional to you.
- **Query Data:** We may retain a history of the queries you submit through the Service.
- **Demographic Data:** We may collect certain of your demographic data.
- **Social Media Data:** We have pages on social media sites like Instagram, Facebook, Twitter, and LinkedIn (“**Social Media Pages**”). When you interact with our Social Media Pages, we will collect Personal Data that you elect to provide to us, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.

Internet Activity Data: When you visit, use, and interact with the Service, we may receive certain information about your visit, use, or interactions. For example, we may monitor the number of people that visit the Service, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access

the Service (e.g., Chrome, Firefox, Microsoft Internet Explorer, etc.), broad geographical information, and navigation pattern. In particular, the following information is created and automatically logged in our systems:

- **Log Data:** Information that your browser automatically sends whenever you visit the Site. Log Data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interacted with the Site.
- **Cookies Data:** Please see the "[Cookies](#)" section below to learn more about how we use cookies.
- **Device Data:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Data:** We collect information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities.
- **Location Data:** We derive a rough estimate of your location from your IP address.] [We collect your location information through the App using your device IP address, WiFi, Bluetooth, and GPS coordinates (e.g. latitude/longitude) of your mobile device. If you have given the App permission to access your location, we may collect your device's location even if you are not using the Service and store your location history. If you want to opt-out of the collection of your location data, please adjust your settings in your mobile device to limit the App's access to your location data.
- **Email Open/Click Data:** We use pixels in our email campaigns that allow us to collect your email and IP address as well as the date and time you open an email or click on any links in the email.

Personal Data We Process on Behalf of Our Business Customers: In order to provide the Service, we may collect Personal Data of employees, contractors or other authorized users of entities or organizations that use the Service (i.e., business customers). We process that information pursuant to our Terms of Service and other agreements with our business customers. We have no direct relationship with the individuals whose Personal Data we process on behalf of our business customers. If you are such an individual and would no longer like your data to be used by one of our business customers that use our Service or you would like to access, correct, or request deletion of your data, please contact the business customer that you interact with directly.

Derived Data: We may infer your preferences for certain products or services based on the Personal Data we collect about you.

Cookies: We use cookies to operate and administer our Site, gather usage data on our Site, and improve your experience on it. A "cookie" is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and help recognize your computer when you open your browser and browse the Internet again (persistent cookies). For more details on cookies please visit [All About Cookies](#).

On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please see the links below for guidance on how to modify your web browser's settings on the most popular browsers:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

Please note that if you limit the ability of websites to set cookies, you may be unable to access certain parts of the Site and you may not be able to benefit from the full functionality of the Site.

Advertising networks may use cookies to collect Personal Data. Most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit the Network Advertising Initiative's online resources at <http://www.networkadvertising.org> and follow the opt-out instructions there.

If you access the Site on your mobile device, you may not be able to control tracking technologies through the settings.

Analytics: We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this data, go to www.google.com/policies/privacy/partners/.

Online Tracking and Do Not Track Signals: We and our third party service providers, may use cookies, pixels, or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site. Our Site currently does not respond to "Do Not Track" ("DNT") signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do respond to DNT signals in the future, we will update this Privacy Policy to describe how we do so.

2. HOW WE USE PERSONAL DATA

We may use Personal Data for the following purposes:

- To provide the Service;
- To respond to your inquiries, comments, feedback, or questions;
- To send administrative information to you, for example, information regarding the Service and changes to our terms, conditions, and policies;
- To analyze how you interact with our Service;
- To maintain and improve the Service;
- To develop new products and services;
- To prevent fraud, criminal activity, or misuses of our Service, and to ensure the security of our IT systems, architecture, and networks; and
- To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.

Aggregated Information. We may aggregate Personal Data and use the aggregated information to analyze the effectiveness of our Service, to improve and add features to our Service, and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Service and share aggregated information like general user statistics with prospective business partners. We may collect aggregated

information through the Service, through cookies, and through other means described in this Privacy Policy.

Marketing. We may use your Personal Data to contact you to tell you about products or services we believe may be of interest to you. For instance, if you elect to provide your email or telephone number, we may use that information to send you special offers. You may opt out of receiving emails by following the instructions contained in each promotional email we send you. In addition, if at any time you do not wish to receive future marketing communications, you may [contact us](#). If you unsubscribe from our marketing lists, you will no longer receive marketing communications but we will continue to contact you regarding management of your account, other administrative matters, and to respond to your requests.

3. SHARING AND DISCLOSURE OF PERSONAL DATA

Relecura does not sell your Personal Data. In certain circumstances we may share the categories of Personal Data described above without further notice to you, unless required by the law, with the following categories of third parties:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may share Personal Data with vendors and service providers, including providers of [hosting services, cloud services, and other information technology services providers, event management services, email communication software and email newsletter services, advertising and marketing services, payment processors, customer relationship management and customer support services, and web analytics services]. Pursuant to our instructions, these parties will access, process, or store Personal Data in the course of performing their duties to us. We take commercially reasonable steps to ensure our service providers adhere to the [security standards](#) we apply to your Personal Data.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider (collectively a “Transaction”), your Personal Data and other information may be shared in the diligence process with counterparties and others assisting with the Transaction and transferred to a successor or affiliate as part of that Transaction along with other assets.
- **Legal Requirements:** If required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users of the Service, or the public, or (v) protect against legal liability.
- **Affiliates:** We may share Personal Data with our current and future affiliates, meaning an entity that controls, is controlled by, or is under common control with Relecura. Our affiliates may use the Personal Data we share in a manner consistent with this Privacy Policy.
- **Business Customers:** As noted above, if you are using the Service on behalf of one of our business customers, we may share your Personal Data with such business customer.

4. DATA RETENTION

We keep Personal Data for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a business need to do so, or as required by law (e.g. for tax, legal, accounting, or other purposes), whichever is longer.

5. UPDATE YOUR INFORMATION

Please [contact us](#) if you need to change or correct your Personal Data.

6. CHILDREN

Our Service is not directed to children who are under the age of 16. Relecura does not knowingly collect Personal Data from children under the age of 16. If you have reason to believe that a child under the age of 16 has provided Personal Data to Relecura through the Service please [contact us](#) and we will endeavor to delete that information from our databases.

7. LINKS TO OTHER WEBSITES

The Service may contain links to other websites not operated or controlled by Relecura, including social media services (“**Third Party Sites**”). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

8. SECURITY

You use the Service at your own risk. We implement commercially reasonable technical, administrative, and organizational measures to protect Personal Data both online and offline from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Service or e-mail. Please keep this in mind when disclosing any Personal Data to Relecura via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service, or third party websites.

9. INTERNATIONAL USERS

By using our Service, you understand and acknowledge that your Personal Data will be transferred from your location to our facilities and servers in the United States.

10. YOUR CHOICES

In certain circumstances providing Personal Data is optional. However, if you choose not to provide Personal Data that is needed to use some features of our Service, you may be unable to use those features. You can also [contact us](#) to ask us to update or correct your Personal Data. You may also delete your account. Please note that we will need to verify that you have the authority to delete the account and certain activity generated prior to deletion may remain stored by us and may be shared with third parties as detailed in this Privacy Policy.

11. CHANGES TO THE PRIVACY POLICY

The Service and our business may change from time to time. As a result we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use our Service or providing us with Personal Data after we have posted an updated Privacy Policy, or notified you by other means if applicable, you consent to the revised Privacy Policy and practices described in it.

12. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us at our designated request address: privacy@relecura.com or <https://relecura.com/contact-us/>