

**POLIMASTER, INC.**

**POLISMART® MOBILE APPLICATION PRIVACY POLICY**

*(Last revised on October 1, 2023)*

**I. Introduction**

Polimaster Inc. and our affiliates (“**Polimaster**”, “**Company**”, or “**We**”) respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you purchase, download, install, register with, access, use, or otherwise operate the Polismart® Mobile Application Software (the “**App**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in this App and in email, text, and other electronic communications sent through or in connection with this App.

This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App, and
- You provide to or is collected by any third party (see [Section 3.5](#) “**Third-Party Information Collection**” for more information).

Our websites and apps and these other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This policy may change from time to time (see [Section X](#) “**Changes to Our Privacy Policy**” for more information). Your continued use of this App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

**II. Children Under the Age of 16**

The App is not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [info@polimaster.us](mailto:info@polimaster.us).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Section VIII](#) “**Your State Privacy Rights**” for more information.

### **III. Information We Collect and How We Collect It**

#### ***3.1. General definitions and types of information***

We collect several types of information from and about users of the App, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline ("**personal information**");
- That is about you but individually does not identify you, such as location data (for example the location data function on a mobile phone), an Internet Protocol (IP) address, time and date when the App was used, the amount of time spent on the App; and/or
- About your internet connection and usage details (including without limitation type of your device used in connection with the App, the type of your operating system - Apple iOS or Android, your operating system version, etc.).

We collect information from and about users of our App:

- Directly from you when you provide it to us: for example, when you request technical/customer support from us and/or when you, at your sole discretion, upload your data to the RadResponder (as further defined) server.
- Automatically when you use the App.

#### ***3.2. Information You Provide to Us***

When you download, register with, or use this App, we may ask you to provide information:

- By which you may be personally identified, such as name, postal address, email address, telephone number or any other identifier by which you may be contacted online or offline ("**personal information**").
- That is about you but individually does not identify you, such as location data (for example the location data function on a mobile phone), an Internet Protocol (IP) address, time and date when the App was used, and the amount of time spent on the App.

This information also includes:

- Information that you provide by filling in forms in the App, on our website, over the phone, or via email. This includes information provided at the time of registering to use the App, subscribing to the RadResponder portal service, posting or uploading materials, and/or requesting further services. We may also ask you for information when you report a problem with the App.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

- Details of transactions you carry out with respect to the App and of the fulfillment of your orders. You may be required to provide financial information before placing an order with respect to the App.
- You may also provide information for publication or display ("**Posted**") on public areas of the App (collectively, "**User Contributions**"). Your User Contributions are Posted and transmitted to others at your own risk. Although you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### **3.3. Automatic Information Collection and Tracking**

When you download, access, use, and operate the App, it may use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's model and hardware information, IP address, operating system type, date, and time.
- **Stored Information and Files.** The App also may access metadata and other information associated with other files stored on your device. This includes, for example, photographs, *provided however* that only you can manually add photos to a real-time measurement taken during the use of the App.
- **Location Information.** This App collects real-time information about the location of your device. In particular, the App makes measurements linked to a certain current location. Such location information can be later sent to the RadResponder portal if you activate this function.

If you do not want us to collect this information do not download the App or delete it from your device or, with respect to your personal information, you may opt-out at any time by following the instructions set forth in Section VI "Your Choices About Our Collection, Use, and Disclosure of Your Information". Note, however, that opting out of the App's collection of location information will disable the App and prevent you from using the App.

### **3.4. Information Collection and Tracking Technologies**

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.

- **Web Beacons.** Pages of the App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).
- **Crashlytics® Tool.** The App uses the Crashlytics® tool to collect the App real-time errors. Such errors are sent later to us and our third-party service providers for further analysis.
- **Google Maps™.** Google Maps™ API was used to develop this App in order to display maps and location information for measurements made by users.

### **3.5. Third-Party Information Collection**

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Analytics companies (including without limitation the Crashlytics® tool service company).
- Your mobile device manufacturer.
- Your mobile service provider.
- Google Maps™ used in this App and the RadResponder portal server may collect, *inter alia*, your location data. “**RadResponder**” is a program of the U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Chemical, Biological, Radiological, and Nuclear Office (CBRN), which constitutes a free web-based platform that standardizes how all federal, state, local, tribal, and territorial disaster response organizations collect, store, use, and manage radiological data following a disaster or manmade event.

These third parties may use tracking technologies to collect information about you when you use this App. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **IV. How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the App and its contents, and any other information, products, or services that you request from us.
- Fulfill any other purpose for which you provide it.

- Give you notices about your account/subscription, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when App updates are available, and of changes to any products or services we offer or provide through it.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the App.

We use location information we collect to enable the App to connect to Bluetooth and Google Maps™, as well as to link your measurements to a certain location and send such information to RadResponder at your request.

## **V. Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company our App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including responding to any government or regulatory request.

- To enforce our rights arising from any contracts entered into between you and us, including the App EULA and terms of sale published at <https://polimaster.com/us/terms.php>, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **VI. Your Choices About Our Collection, Use, and Disclosure of Your Information**

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

- **Location Information.** You cannot choose whether or not to allow the App to collect and use real-time information about your device's location because this is one of the essential functions of the App. If available based on your wireless GPS satellite connection and/or if you upload data previously collected offline, your measurements are linked to the location information, which is collected automatically pursuant to measurement protocols and stored in your local (mobile phone) database. If you block the use of location information, the App becomes inaccessible or stops functioning properly.
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, you can opt out by sending your request to [info@polimaster.us](mailto:info@polimaster.us).
- **No Disclosure of Your Information for Third-Party Advertising and Marketing.** We do not share your personal information with unaffiliated or non-agent third parties for advertising and marketing purposes.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's website.

Residents in certain states, such as California, may have additional personal information rights and choices. Please see [Section VIII Your State Privacy Rights](#) for more information.

## **VII. Accessing and Correcting Your Personal Information**

You may send us an email at [info@polimaster.us](mailto:info@polimaster.us) to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the App, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other App users.

Residents of certain states, such as California, Nevada, Colorado, Connecticut, Virginia, and Utah may have additional personal information rights and choices. Please see below Section VIII “Your State Privacy Rights” for more information.

### **VIII. Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, visit <https://oag.ca.gov/privacy/ccpa>. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [info@polimaster.us](mailto:info@polimaster.us).

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.
- Colorado, Connecticut, and Virginia also provide their state residents with rights to:
  - Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
  - Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please contact us at any other time by sending an email stating your request to [info@polimaster.us](mailto:info@polimaster.us).

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: [info@polimaster.us](mailto:info@polimaster.us). However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **IX. Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the App like message boards. The information you share in public areas may be viewed by any user of the App.

Unfortunately, the transmission of information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## **X. Changes to Our Privacy Policy**

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page <https://polimaster.com/us/terms.php>. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

## **XI. Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Polimaster Inc.  
44873 Falcon Place, Suite 128  
Sterling, Virginia 20166  
Email: [info@polimaster.us](mailto:info@polimaster.us)  
Phone: (703) 525-5075  
*or via our toll-free number:*  
+1 866 5607654(POLI)

To register a complaint or concern, please contact us at:

Polimaster Inc.  
Legal Department  
44873 Falcon Place, Suite 128  
Sterling, Virginia 20166  
Email: [legal@polimaster.us](mailto:legal@polimaster.us).

## **XII. Additional Information for non-US Residents**

**IMPORTANT NOTICE:** This privacy policy originates from and regulates the App predominantly operated in the United States, which has different data protection laws from those of other nations, particularly member nations in the European Union. Due to differing laws and legal practice, be aware that law enforcement agencies in the United States may have access to your personal information when allowed under applicable law of the United States.

As the Internet is a global environment, collecting and processing personal information may involve the transmission of this data internationally, including into and/or outside of the United States. Therefore, by downloading, using, and operating our App and/or communicating electronically with us, you acknowledge and consent to your data being processed in this way and to our collecting, transmitting, and storing your personal information out of the country in which you reside.

Specifically, if you are located outside of the United States, please be aware that by downloading, using, and operating the App, your personal information may be transferred to the United States or other third countries, the privacy laws of which may be deemed by your country to have inadequate data protection. If you are located outside of the United



States and voluntarily submit personal information to us, you thereby consent to the general use of such information as provided in this Privacy Policy and to transfer of that information to, and/or storage of that information in, the United States or other third countries.

If you reside in the European Union, you have certain rights under the European Data Protection Regulation (“GDPR”), including:

- the right to be informed of the personal information we collect and how we process that data;
- the rights to request access to your personal information;
- the right to request inaccurate personal information be rectified or completed, if incomplete;
- the right to request the erasure of your personal information;
- the right to restrict the processing or use of your personal information;
- the right to obtain and reuse your personal information for your own purpose;
- the right to object to our processing or transferring your personal information; and
- the right to lodge a complaint with a supervisor authority under the GDPR.

We have a legitimate interest in collecting and processing your information for the purposes we have outlined in this Privacy Policy so that we can optimize your experience with the App. We retain and store your personal information only for as long as we have a legitimate business purpose to do so and in accordance with this Privacy Policy.

In response to receiving a request for one of the rights set forth above directed at [legal@polimaster.us](mailto:legal@polimaster.us), Polimaster will timely comply with the request within the time periods set forth in the GDPR for each right. Several of the above rights are not absolute and apply only in certain circumstances. Polimaster will comply with requests for those rights as set forth in the GDPR. We are intent on resolving any issues relating to our handling of your personal information, and you may contact us at any time regarding any questions or concerns.

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