My Key Mobile Privacy Policy

This Privacy Policy describes the Personal Information gathering and use practices of Hyman Global Holdings, Inc. (referred to as "<u>Hyman</u>," "<u>we</u>" or "<u>us</u>") for the "My Key Mobile" app (collectively, the "<u>App</u>"). This Privacy Policy does <u>not</u> apply to data collection or practices of Hyman with respect to any other business lines, websites or apps.

Defined Terms

As used in this Privacy Policy:

- "Aggregate Data" means data that has been derived from Personal Information but that cannot be used to identify any particular individual.
- "Cookie(s)" means the small text file containing alphanumeric characters that is placed on your Device when you use the App and uniquely identifies your Device and the browser you are using on the Device.
- "Device" means the phone or other mobile device from which you access the App.
- "General Purposes" is defined in Section II(1) below.
- "Location Data" means information provided by your Device related to the location of you and your Device, including region, country code, city code, mobile network code, cell identity, district name, longitude and latitude information, time zone settings, and language settings.
- "Lock" means the Bluetooth-enabled electronic deadbolt door locks associated with the App.
- "Non-Personal Information" means information about your Device and use of the App that is not Personal Information. Non-Personal Information includes your IP address, device ID and other similar information as described in Section II(5) below.
- "Passcodes" means App passwords, Lock passcodes and eKeys as described in the User Guide.
- "Personal Information" means information that may be used to identify a specific individual, or that is about an identifiable individual, including but not limited to name, email address, or phone number. Personal Information does not include aggregate or anonymized data.
- "Registration Information" is defined in Section II(1) below.
- "User Guide" means the written user guide included with your Lock.
- "User Information" means all information about you that you enter into the App, including your name, email address, mobile phone number, Location Data and other information about you or your household associated with your account in our systems.

I. Intended for Users Within the United States

The App resides upon servers located in the United States of America. If you are located outside the United States, please be aware that information you provide via the App is being transferred to and stored in the United States. The Personal Information practices of this Privacy Policy may or may not comply with the law of your jurisdiction, so if you do not agree with this, please do not use the App.

II. Personal Information Collected and Purposes for Use

We do not collect any Personal Information on the App unless you provide it voluntarily. However, certain Non-Personal Information, such as IP address or device ID, is collected automatically from every user who downloads the App, even if not voluntarily provided, as discussed further under "Non-Personal Information."

We collect and use Personal Information in the specific ways listed below for each type of information identified, as well as:

- to provide you with requested services, including support services;
- to analyze and improve our products and services;
- to improve the App or our services;
- to investigate or settle any disputes with you;
- to meet our legal obligations such as responding to mandatory subpoenas;

and for other internal uses not inconsistent with this Privacy Policy (the "<u>General Purposes</u>"). In each case, we also use Personal Information you provide for purposes consistent with the reason you provide such information to us.

1. <u>Registration as User of the App</u>. After downloading the App, you may register for an account via the App. This is necessary in order to make use of the App in conjunction with the Lock. In order to register for an account, you will need to provide name, email address and the phone number of your Device (collectively, "<u>Registration Information</u>").

In addition to the General Purposes, we use Registration Information to allow you to make use of all the functions of the Lock, to communicate with you about your activities with respect to the Lock (including customer support), to fulfill requests that you make of us, and, with your prior consent, to send you marketing messages as set forth in Section II(4) below.

- 2. <u>Use of App</u>. When you use the App in conjunction with the Lock, you will be asked to set up one or more Passcodes to protect the security of the Lock. These Passcodes, their uses and their functions are described in the User Guide. Where you transmit an eKey to another person, the phone number of that person's Device is collected and used to associate with the Lock to enable use of the Lock, and for support services when you enable that person as an administrator of the account. The App tracks your interactions with the Lock as well as all activities in the App with respect to the use of the App and Lock.
- 3. <u>Transactional Messages Via App</u>. If you have enabled notifications from the App, you will receive transactional messages from us via the App regarding the use of the App and Lock, including notices of your successful completion of tasks in App setup or use of the App. *If you wish to receive messages about unsuccessful attempts to use the Lock to access your property, you must enable these notifications.*
- 4. <u>Marketing Messages from Us</u>. We may send you e-mails about other products that may be of interest to you from Hyman, but you may opt-out of receiving marketing and similar e-mails at any time; see the section below entitled "Communications from Hyman and Your Choices."
- 5. <u>Non-Personal Information</u>. We automatically collect your IP address and other non-Personal Information when you visit our Sites. Other types of Non-Personal Information we may collect includes:
 - Location Data:
 - Data from Cookies (see also Section II(6) below for more information about Cookies), which may include:
 - With respect to your Device, Device IDs and/or characteristics such as IMEI number, IMSI number, MAC address, DID, network status of the device (IP/network signal), and the version of your firmware; and

 With respect to the software on your Device, information such as the version of your operating system, mobile browser in use, model name, and network operator unique device identifiers (sometimes called UDID).

We do not correlate this information with Personal Information about you in our systems. In addition to the General Purposes, we use this information to properly display the App on your Device, to help diagnose problems with our systems, and to administer our services and the App.

Use of certain functionality for the App (such as control over the Lock using the App) and Services is dependent on your enabling of Location Data on your Device, and you have consented to such uses when you have enabled Location Data on your Device.

6. <u>Cookies</u>. Cookies come in various types, including those set by the company offering an App and those set by third parties, such as analytics and advertising cookies. The App does not contain any third party cookies. We use the cookies that we set on your Device to allow you to save your password on the device (if you wish) for your convenience, and to allow you to more easily navigate the App.

You can decide if and how your computer will accept cookies by configuring your preferences option within your Device's browser. To disable this function in your browser, choose the "help" menu and follow the instructions for deleting cookies and preventing your browser from downloading additional cookies. If you choose to reject cookies, you can still use the App, but certain functionality (including saving of passwords) will not be available.

III. How We Share Your Personal information

We do not sell or rent your Personal Information to third parties unless you have given your opt-in consent to such sharing. Other than as described in the previous sentence, we will not share your Personal Information with third parties without your permission, other than (i) as necessary to comply with applicable law, court orders or other judicial process, (ii) enforce or apply our agreements with you, (iii) protect the rights, property, or safety of us, other users or third parties, (iv) as noted in the two paragraphs immediately following below, or (vi) as otherwise required or permitted under applicable law.

In the unlikely event of a corporate transaction such as a sale or reorganization, or the bankruptcy or similar restructuring of Hyman, we reserve the right to disclose and/or transfer your Personal Information to potential buyer(s) as part of such process. Your Personal Information will not be sold or assigned separately from the goodwill of our company in such process.

We may also hire contractors to provide certain services on our behalf, including analyses of our App, information processing and storage, and/or development of new products or services. As part of their services to us, these contractors may have access to some or all of the data that we maintain, including your Personal Information, but they are required to maintain all data in confidence and to use the data only in order to provide services to us.

Notwithstanding the foregoing, we are not restricted under this Privacy Policy from sharing Aggregate Data with third parties, including for marketing purposes. While this Aggregate Data may have been derived from your Personal Information, the Aggregate Data will not contain information that may identify you individually, and as such, you will not be contacted by such third parties using such shared information.

IV. Communications from Hyman and Your Choices

1. <u>Use of Your Device's Phone Number</u>. You acknowledge that by voluntarily providing your telephone number of one or more Devices, you expressly agree to receive text messages (or in support situations, phone calls) from us in relation to the App or our services. You acknowledge that text messages may be made to the number of your Device even if your number is registered on any state or federal Do Not Call list. You agree that we may obtain, and you expressly agree to be contacted at, any email addresses or

phone numbers provided by you at any time or obtained through other lawful means, such as caller ID capture, or other means. There is no fee to receive text messages or support calls from us, but you may incur a charge for these text messages or calls from your applicable telephone or similar carrier. You may at any time delete your account using the instructions provided in the User Guide, and this will result in the deletion of your Device's phone number.

2. <u>Emails</u>. We may send you emails using the email address provided as part of your Registration Information as necessary to carry out services you have requested, including support services. You cannot opt out of these messages, but you may at any time delete your account using the instructions provided in the User Guide, which will result in the deletion of your email address.

In addition, you may receive promotional e-mails regarding the App and/or other products or services offered by Hyman or its licensors. You may choose not to receive these promotional e-mails at any time either by following the opt-out instructions on the e-mail in question or by e-mailing us at optout@hymaninc.com. Please allow us at least ten (10) days in which to process your opt-out request.

V. California Do-Not-Track

As noted above in Section II(6), use of the App involves only the placement of functional cookies (not tracking cookies) on your Device. If your Device blocks the placement of all cookies, it may result in lessened functionality of the App, and your Device will not remember your passwords to the App.

VI. Children Under 18

The Sites are provided for users over the age of 18. If you are a child under the age of 18, please do not use the Sites.

VII. Security

The App has reasonable security measures in place to protect the loss, misuse and alteration of the information under our control. Only our employees who need to access the information to perform a specific task have access to your Personal Information, and the computers/servers on which your Personal Information is stored are kept in a secure environment. In addition, when you access your account, you can choose to use our two-step verification program for better security. When you send information to our home server from your Device or receive information through the same channel, we make sure that it is encrypted using a number of protocols including Secure Sockets Layer (SSL).

However, no data transmission over the Internet or an unsecured WiFi network can be guaranteed as 100% secure. As a result, while we strive to protect your Personal Information during transmission, we cannot guarantee the security of any information you transmit to us or receive from us. We urge you to take steps to keep your Personal Information safe (including your Passcodes), log out of your account after use, and close your web browser. If you do share your Passcodes or other Personal Information with anyone or fail to secure this information (for example, by transmitting over a WiFi network that is not secure), you are responsible for all actions taken in your account's name. Because of this, if the security of your Passcodes has been compromised in any way, you are responsible for immediately notifying us and for changing your Passcodes.

VIII. Updating Your Personal information

You can review and update your Personal Information by logging into your account in the App. You should act to update it promptly upon changes in your Personal Information or to correct any errors in it. At your request, we will close your account and make any Personal Information pertaining to you no longer publicly viewable as soon as reasonably possible, in accordance with applicable law.

IX. Acceptance/Changes to this Privacy Policy

By using the App, you signify your acceptance of this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not submit any Personal Information to us through the App. Please check this Privacy Policy periodically to inform yourself of any changes. We reserve the right to modify this Privacy Policy at any time, so you should review it frequently. If we make material changes to this Privacy Policy, we will post such revised policy on the App and notify you by e-mail or otherwise make you aware of the changes as permitted by law.

X. Contacting Us

Should you have any questions or concerns about the privacy of your Personal Information or this Privacy Policy, please contact us at the addresses below and we will strive to resolve them:

Hyman Global Holdings, Inc. 860 E. Sandhill Ave. Carson, CA. 90746

Attn: Customer Service – Privacy Policy

Effective Date of Privacy Policy: August 30, 2020 © 2020 Hyman Global Holdings, Inc. All rights reserved.