

# Collection and Use of Personal Information

Personal information is data that can be used to identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with SparkCharge or an SparkCharge affiliated company. SparkCharge and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Here are some examples of the types of personal information SparkCharge may collect and how we may use it:

## What personal information we collect

- When you create a SparkCharge ID, purchase a product, contact us or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, and credit card information.
- When you use SparkCharge products, send gift certificates and products, or invite others to use SparkCharge services or forums, SparkCharge may collect the information you provide about those people such as name, mailing address, email address, and phone number. SparkCharge will use such information to fulfill your requests, provide the relevant product or service, or for anti-fraud purposes.

## How we use your personal information

- The personal information we collect allows us to keep you posted on SparkCharge’s latest product announcements, software updates, and upcoming events. If you don’t want to be on our mailing list, you can opt out anytime by updating your preferences.
- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of SparkCharge account holders.
- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with SparkCharge, you may not opt out of receiving these communications.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve SparkCharge’s products, services, and customer communications.
- If you enter into a sweepstake, contest, or similar promotion we may use the information you provide to administer those programs.

## Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as occupation, language, zip code, area code, unique device identifier, referrer URL, location, and the time zone where a SparkCharge product is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure quality of our services over the Internet, such information will not be associated with your IP address.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

## Cookies and Other Technologies

SparkCharge's websites, online services, email messages, and advertisements may use cookies and other technologies, such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

Ads that are delivered by SparkCharge’s advertising platform may appear in SparkCharge News and Store. If you do not wish to receive ads targeted to your interests from SparkCharge's advertising platform, you can choose to enable Limit Ad Tracking, which will opt your account out of receiving such ads regardless of what device you are using. If you enable Limit Ad Tracking on your mobile device, third-party apps cannot use the Advertising Identifier, a non-personal device identifier, to serve you targeted ads. You may still see ads in the Store or News based on context like your search query or the channel you are reading. In third-party apps, you may see ads based on other information.

SparkCharge and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience with SparkCharge more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit the SparkCharge Online Store. Knowing your country and language – helping us provide a customized and more useful shopping experience.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole. SparkCharge may use this information in our marketing and advertising services.

In some of our email messages, we use a “click-through URL” linked to content on the SparkCharge website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

## Disclosure to Third Parties

At times SparkCharge may make certain personal information available to strategic partners that work with SparkCharge to provide products and services, or that help SparkCharge market to customers. For example, when you purchase unit, you authorize SparkCharge and your carrier to exchange the information you provide during the purchase process to carry out service. Personal information will only be shared by SparkCharge to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

## Service Providers

SparkCharge shares personal information with companies who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information and may be located wherever SparkCharge operates.

## Others

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for SparkCharge to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

## Protection of Personal Information

SparkCharge takes the security of your personal information very seriously. SparkCharge online services such as the SparkCharge Online Store protect your personal information during transit using encryption such as Transport Layer Security (TLS). When your personal data is stored by SparkCharge, we use computer systems with limited access housed in facilities using physical security measures.

When you use some SparkCharge products, services, or post on an SparkCharge forum, or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

## Integrity and Retention of Personal Information

SparkCharge makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

# Access to Personal Information

For other personal information we hold, we will provide you with access (including a copy) for any purpose including to request that we correct the data if it is inaccurate or delete the data if SparkCharge is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

# Third-Party Sites and Services

SparkCharge websites, products, and services may contain links to third-party websites, products, and services.

Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

# Our Company-wide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to SparkCharge employees and strictly enforce privacy safeguards within the company.

# Privacy Questions

If you have any questions or concerns about SparkCharge's Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us by sending us an email.

When a privacy question or access/download request is received we have a dedicated team which triages the contacts and seeks to address the specific concern or query which you are seeking to raise. Where your issue may be more substantive in nature, more information may be sought from you. All such substantive contacts receive a response. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

SparkCharge may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

SparkCharge Corp. Syracuse, NY.