

## MAARK PRIVACY POLICY

The MAARK web site and related mobile applications, products, and services (collectively, the “Site”) and the MAARK tracking device service (“Service”) is brought to you by MAARK limited (“we”, “us”, or “our”). By using the Site and Service, you agree to the collection, use and disclosure of your information as described in this MAARK Privacy Policy (“Policy”). If you do not agree to the terms of this Policy, please do not use the Site or Service.

### Information We Collect

The Site. As part of the standard operation of the Site, we may collect information from your computer or mobile device, including but not limited to your browser type, operating system, IP address and the domain name from which you accessed the Site, and if you are accessing our Site or Service with your mobile device, type of mobile device, version of our software, and how you use our software such as the features and functions you use and frequency of use. In addition, we may collect information about how you use our Site, such as the date and time you visit the Site, the pages of the Site that you visit, the amount of time you spend viewing the Site, the number of times you return to the Site and other click-stream data.

The Service. To establish your account with the Service and enable you and us to manage it, we will collect information from you and those who you associate with your account such as name, address, telephone number, credit card information, account number, equipment identifiers and Internet Protocol addresses. As you use the Service, we will collect information necessary for the provision of the Service such as the location of your MAARK tracking devices on your account as well as information about how you use the Service such as the features or functions that you use. If you allow others to access your account, they will be able to view the location of your MAARK tracking devices as well as other information applicable to your account, including geo-fence information which may disclose the location of your residence or other locations personal to you, pet information and other information about your account, excluding your payment information. Information You Submit. If you voluntarily submit information to us—for example, if you register on the Site, order products or services, participate in a survey, contact us or provide us feedback, supply additional information to your account or profile, or respond to our request for information—we will collect the information you submit. In each such instance, you will know what data we collect, because you actively submit it. We will use the data you voluntarily submit to us for the purposes we describe in this Policy, as well as any purposes that we describe to you when we collect such information.

### Cookies & Web Beacons

We may use cookies to collect the information described above. A cookie is a small text file that may be stored on the hard drive of your computer or device when you access the Site. We may also use cookies to: (1) provide you with customized content and advertising; (2) monitor Site usage; (3) remember you when you return to the Site; and (4) conduct research to improve our content and services.

We may also allow other companies such as web analytics partners, advertisers, or ad networks to set or access their cookies or Web beacons on the Site. For example, we may use third party advertising companies to serve ads on our behalf across the Internet or to display ads for other companies on our Site. These third-party advertising companies employ cookies and Web Beacons to measure and improve the effectiveness of ads for their clients, including us. To do so, these companies may use information about your visits to our Site and other websites. This information may include: date/time of banner ad shown or their cookie. This anonymous information can also be used for online preference marketing purposes. These third parties may use information about your visits to this and other websites in order to provide ads about goods and services of interest to you.

### **Cross-Border Transfer**

The information we collect is stored and processed on servers in the Hong Kong and may also be stored in other locations around the world. By using the Site and/or Service you consent to the transfer of the information described in this Policy to locations that may be outside of the country in which you live, and such places may be in the United States, within one or more European countries, and/or in one or more countries within Asia. If you choose to access the Site or Service from outside the Hong Kong, you do so on your own initiative and are responsible for compliance with local laws. If any provision within this Policy is held to be invalid or unenforceable, such provision shall be struck and all remaining provisions shall be enforced.

### **Use of Information**

We may use the information we collect from and about you for any of the following purposes: (1) for account verification and to fulfill your requests for products and services; (2) to provide the Service, (3) provide you with targeted offers and advertising on the Site; (4) to contact you with information and promotional materials and offers from our company as well as from our subsidiaries, affiliates, marketing partners, advertisers and other third parties; (5) to contact you when necessary; (6) to address problems with the Site, our business or our products and services; (7) to protect the security or integrity of the Site, Service and our business; (8) to improve our Site and Service and develop new products and services, and (9) otherwise, as disclosed to you at the point of information collection. To the extent permitted by applicable law, we reserve the right to combine the various types of data that we collect and to combine the data we collect with data we acquire from other entities.

### **Disclosure of Information**

We may disclose information collected from and about you to the following entities for the following purposes: (1) to our service providers and suppliers, if the disclosure will enable any of them to perform a business, professional or technical support function for us; (2) to our service providers, suppliers, and others under conditions of confidentiality to improve their systems, services, and other business purposes, (3) as necessary if we believe that

there has been a violation of the Customer Contract, MAARK Website Terms of Use, or of our rights or the rights of any third party; (4) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and (5) otherwise, with your consent. In addition, in the event that our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets. Finally, we may share your information with third parties who may contact you with offers and other marketing communications. If you would like a list of those entities with whom we share your personal information for those entities own direct marketing purposes, please send us a request by using the Contact Us form on the Website or as provided in the Contact Us section below.

### **Forums & Blogs**

Our Site or Service may provide a forum, blog, or other interactive feature that allows you to disclose information directly to us and other users of the Site or Service. Your participation in such interactive features is completely voluntary and we assume no obligations or responsibility with respect to the information you provide or share through such interactive features. To participate in these interactive features, we may require you to register with us and provide certain information such as your name, email address, location, phone number, and desired display name (which may be viewable by other users of the interactive features). We or our service providers acting on our behalf may use the information you provide during the registration process for analytical and development purposes (such as to make product or service enhancements) and to enable you to use the interactive features and to manage your account. You may also personalize our interactive features by voluntarily providing additional information such as your location, instant message contact information, website address, occupation, and other information. Our interactive features may also allow you to upload an avatar or other graphical representation of yourself. If you voluntarily provide such additional information, it may be viewable by other users of the interactive features - so you should not provide information you do not want other users to know.

### **Opt-Out**

You can stop the collection of location information from your MAARK tracking device(s) at any time by turning them off. In addition, if you do not want us to collect, use, and share the information we describe in this Policy, please discontinue your use of the Site and Service. In connection with promotions, surveys, or other projects, we may ask you specifically whether you have objections against a certain kind of data use or sharing. If you opt-out under such circumstances, we will respect your decision.

Please note that our affiliates and other data recipients have their own data privacy policies, which may differ from ours and you would have to contact them separately with respect to opt-out requests.

### **Accessing and Changing Your Account Information**

You can review the personal information you provided to us and make any desired

changes to the information you share, or to the settings for your account at any time by logging in to your account. Please be aware that even after your request for a change is processed, we may, for a time, retain uncorrected, residual information about you in backup and/or archival copies of our database. To access other personal information, we may have associated with your account, please contact us by using the Contact Us form on the Website or as provided in the Contact Us section below. Upon request, we will provide you a copy and/or description of any personal information we hold about you within in a reasonable time and we will correct or delete it upon your request.

### **Security**

We have taken certain physical, electronic, contractual, and managerial steps to safeguard and secure the information we collect from our Site and Service. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. If you register on our Site or for our Service, it is your responsibility to protect the security of your login information.

### **Closing Your Account & Deleting Information**

You can close your account by contacting us using the Contact Us form on the Website or as provided in the Contact Us section below. If you would like us to remove the information we have about you from our databases, please contact us by using the Contact Us form on the Website or as provided in the Contact Us section below and we will remove your information within a reasonable time but we may retain information about you in our non-public databases for a reasonable period of time to support our operational requirements (for example only, reconciling your transactions). Notwithstanding the foregoing, there may be circumstances where we are legally required to retain the information we collect about you (for example, in connection with court proceedings) and despite your request for us to delete your information, we will retain what we are legally required to keep. Moreover, we reserve the right to make anonymous the information so that it is no longer associated with your account rather than deleting it. We also reserve the right to use previously obtained information to verify your identity or take other actions that we believe are appropriate. If you close your account, we have no obligation to retain your information, and may delete any or all of your account information without liability.

### **Children**

We do not direct the Site to, nor do we knowingly collect any personal information from, children under thirteen.

### **Links & Third-Party Websites**

The Site may contain links to third-party websites or services, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these sites. Accordingly, we recommend that you review the privacy policy posted on any site that you may access through the Site.

**Changes to This Privacy Policy**

We may change this privacy policy from time to time. When we do, we will post the change(s) on our website. If we change the policy in a material way, we will provide appropriate online notice to you.

**Effective Date: September 1, 2017**