

## PRIVACY POLICY

**Last updated: July 11, 2018**

SpotOn.Pet LLC (“**SpotOn**,” “**us**,” “**our**” or “**we**”) is committed to protecting your privacy. Our privacy policy, which applies to all users of our website (<https://www.spoton.pet/>) (“**Website**”), the SpotOn mobile device application (“**App**”) and any and all services provided by SpotOn through the Website and/or App (“**Service**”), is designed to explain the information we collect and how we use it to provide our services and give users a better experience (“**Privacy Policy**”). [Capitalized terms not defined in this Privacy Policy have the meanings given in our Terms of Use located at [<https://www.spoton.pet/>]. This Privacy Policy is part of, and incorporated into, the Terms of Use.]

By accessing and using the Website, App and/or Service, you consent to our collection, storage, use and disclosure of your personal information and other information as described in this Privacy Policy.

### **1. Types of Information We Collect**

We may collect both “**Personal Information**” and “**Anonymous Information**” about you when you use the Website, App and/or Service. Personal Information is information that can be used to contact or identify you, such as your full name, email address, phone number, payment method and profile picture, as well as information that is linked to such information. “Anonymous Information” is information that cannot be used to contact or identify you and is not linked to information that can be used to do so. It includes passively collected information about your activities on the Service, such as usage data, to the extent that information is not linked to your Personal Information.

You can access and browse certain portions of the Website and download the App without disclosing your Personal Information, although, like most website and mobile app providers, we passively collect certain information from your devices, such as your IP address, browser information, unique device identifier (“**UDID**”) and/or your mobile operating system. **Please note that you can choose not to provide us with certain information, but this will limit the features of the Service you can access and use.** In order to utilize the Service, you must register with SpotOn through the App. Anyone who registers with SpotOn is a Rider (“**Rider**”).

#### **a. Voluntarily submitted information**

We collect information that you provide to us during your use of the Website, App and/or Service, such as:

- Personal Information that you enter when registering for the Service, including your full name, email address, phone number, payment method, billing information and profile information.
- Communications with us or with other Riders or drivers of vehicles using the Service (“**Drivers**”).
- Information you provide in your profile preferences, to customer support services or that you post on any forums or message boards.

#### **b. Information collected through use of the Service**

- **Location data:** If you access the Service through a mobile device, we may access, collect, monitor and/or remotely store “location data,” which may include the GPS coordinates of your trip (including pick-up and drop-off data) or similar information regarding the location of your mobile device.
- **Contacts:** We may access your address book or contacts if you provide us with your permission to do so through the “prompt” message we will send to you at the time of your registration.
- **Transaction data:** We collect information created during your various interactions with the Service, including the date and time of a ride booked through the Service (“**Ride**”), distance of Ride and amount charged.

c. Information collected via technology

- If you are using our Website, we collect information from you, including your hardware model, browser type, operating system, Internet Protocol (IP) and domain name. If you are using a mobile device, SpotOn may also receive your UDID, or another unique identifier, and mobile operating system. We may correlate this information with other Personal Information we have about you. We may also use cookies and URL information to gather information regarding the date and time you used the Service and the information for which you searched and accessed. “**Cookies**” are small pieces of information that a website sends to your device while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them) to provide you with a more personal and interactive experience. Persistent Cookies can be removed by following general web browser help file directions.
- In connection with your use of the Service, we may receive your call data, including the date and time of calls and SMS messages, the parties’ phone numbers and the content of SMS messages that relate to your booking of Rides.
- If you log in to our Service with social media credentials (e.g., Facebook or Twitter log-in), your Personal Information may be provided to us by such social media site.
- If you choose to link your SpotOn account with a third party payment provider (e.g., Google Wallet), your Personal Information may be provided to us by such payment provider.

d. Information provided by others

- We collect information that Riders and Drivers provide about one another, including via ratings and postings on forums or message boards.

2. How We Use Your Information

a. Personal Information

We may use your Personal Information for the following purposes:

- Register and administer your account.
- Provide and maintain the Service.
- Facilitate communications between Riders and Drivers.
- Offer customer support and diagnose technical and service problems.

- Send communications and administrative emails about the Service and reply to your inquiries.
- Provide you with promotional and advertisement materials, which may be based on your prior activity.
- Personalize and tailor the features, performance and support of the Website, App and Service.
- Send you promotional/marketing information, newsletters, offers or other information from us or on behalf of our sponsors or partners.
- Offer you participation in special events, programs, surveys and market research.
- Provide you with opportunities and functionality that we think would be of particular interest to you.
- Improve existing and develop new products and services.
- Improve the quality and safety of the Website, App and Service and perform internal operations.
- Analyze, benchmark and conduct research on Rider and Driver data and interactions with the Service.
- Perform accounting, auditing and other corporate procedures.
- Prevent and identify fraud and other unlawful activity.
- Comply with and enforce applicable legal requirements, relevant industry standards and our policies.

b. Anonymous Information

We may use Anonymous Information for the following purposes:

- Improve the Website, App and Service and customize your experience, such as by providing targeted useful features and promotions based on the type of services you seek.
- Aggregate the information collected via Cookies and similar technologies to use in statistical analysis to help us track trends, evaluate the effectiveness of our ads and analyze patterns.

**3. How We Share and Disclose Information**

We know how important it is to keep your information confidential. We will not rent, sell or share your Personal Information with third parties except as specifically approved by you at the time of disclosure or under the circumstances described below.

If you do not want us to use or disclose Personal Information collected about you in the ways identified in this Privacy Policy, you may choose not to (a) provide your Personal Information at any time or (b) download the App and become a Rider.

In addition to using the information collected by us for the purposes described in Section 2 above, we may also share your information as described below. Please review our sharing policy closely, especially with respect to your Personal Information. By becoming a Rider, you agree to allow us to share the Personal Information you provide to us in the ways described in our Privacy Policy. Your ability to make changes to what information is shared is described below.

a. Riders and Drivers

- We share certain information about Riders (e.g., name, rating, pick-up and drop-off locations) with Drivers to enable the scheduling and provision of Rides.

- Information provided on any SpotOn online forum or message board may be viewed by any Riders or Drivers who access the forum or board.

b. Service Providers

We also share Personal Information with vendors, consultants and data processors who perform services on behalf of SpotOn, including without limitation, companies that provide email services and host the Website, App and Service. SpotOn has selected companies who maintain high standards with respect to privacy and agree to use the Personal Information only to perform specific services on behalf of SpotOn and in accordance with the terms and conditions of this Privacy Policy.

c. Compliance with Laws, Law Enforcement and Safety

We may disclose information we have collected about you if required to do so by law or if we, in our sole discretion, believe that disclosure is reasonable to comply with the law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law), or to protect or defend SpotOn or a third party's, rights or property. We may also reserve the right to disclose information we've collected about you for purposes of protecting the health and safety of our Riders and Drivers, such as in the case of risk of harm or violence against any person.

d. Anonymous information

Aggregated Anonymous Information is the combination of your Anonymous Information with the Anonymous Information of other Riders ("**Aggregated Anonymous Information**"). Aggregated Anonymous Information does not allow you to be identified or contacted. We may share such Aggregated Anonymous Information with third parties, and, depending on the circumstances, we may or may not charge third parties for such information, or limit the third parties' use of the same.

e. Business transactions

We may share all or some of your Personal Information with any of our subsidiaries, joint ventures, or other companies under common control, in which case we will require them to honor this Privacy Policy. Additionally, in the event we undergo a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Privacy Policy, and that any entity that acquires us, is merged with us or that acquires our assets may continue to process your Personal Information as set forth in this Privacy Policy.

#### 4. Your Choices

By becoming a Rider, you consent to receive certain communications from us. You may modify or opt out of receiving messages sent for marketing purposes, or certain other communications, by adjusting your account settings or following the unsubscribe instructions in such messages. Please note that despite any indicated marketing preferences, we may send you administrative emails regarding the Website, App or Service, including, for example, notices of updates to our Privacy Policy.

## **5. Updating Your Personal Information**

You may revise your Personal Information by adjusting your account settings on the app or by contacting us directly at [aparna@spoton.pet](mailto:aparna@spoton.pet). However, please note that we may be required to maintain certain Personal Information, or to maintain certain Personal Information for a period of time, in which case we will comply with your deletion request if possible, only after we have fulfilled such requirements. When we delete any information, it will be deleted from our active database, but may remain in our archives. We may retain your information for fraud detection or similar purposes. Note that if we have already disclosed some of your Personal Information to third parties, we cannot access that Personal Information any longer and cannot compel the deletion or modification of any such information by the parties to whom we have made those disclosures.

## **6. Children**

You must be 18 years of age to become a Rider. The Website, App and Service are not directed at or intended for anyone under 18 years of age. We do not knowingly collect or solicit Personal Information from individuals under 18 years of age and no one under age 18 may provide any Personal Information to SpotOn. If we later obtain actual knowledge that a Rider is under 18 years of age, we will take steps to remove that individual's Personal Information from our systems and delete the account. If you are the parent or guardian of a child whom you believe has disclosed Personal Information to us, please contact us at [aparna@spoton.pet](mailto:aparna@spoton.pet) so that we may delete and remove such information from our systems.

## **7. Security and Data Retention**

We are very concerned with safeguarding your information. We employ all reasonable administrative, physical and electronic measures designed to protect your information from unauthorized access. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email, text or conspicuous posting on the Website in the most expedient time possible and without unreasonable delay, insofar as it is consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system. Although guaranteed security does not exist either on or off the Internet, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations.

We will retain your Personal Information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. Your consent to such purpose remains valid after termination of our relationship with you.

## **8. Third Party Websites**

SpotOn may provide links to other websites or content that may be of interest to you. However, we are not responsible for the privacy practices employed by those websites or content providers, nor are we responsible for the information they contain. This Privacy Policy applies solely to information collected by us through the Website, App and Service; thus when you use a link to go from our Website or App to another third party website, this Privacy Policy is no longer in effect. We encourage you to read and consider the privacy policies of these other websites before using them.

## 9. Ad Networks and Third Party Cookies

We may have agreements with companies, sometimes called “**Ad Networks**” that serve advertising on our Website, App or Service on behalf of third parties. These Ad Networks may place or recognize a “**Third Party Cookie**,” on your browser. Ad Networks use cookies to understand the web usage patterns of people who see advertisements, to control the sequence of advertisements you see, to provide you with the most relevant advertising, and to make sure you do not see the same ad too many times. Ad Networks may connect information about pages you visit through our Services with information about pages you visit on other sites and show you advertising based on this combined information. We do not control Ad Networks or what they do with the information they collect. Many Ad Networks participate in the Network Advertising Initiative (NAI) and abide by NAI principles, which prohibit members from connecting Personal Information to information they collect through cookies without your explicit consent. If you wish to opt out of participating in advertising programs conducted by NAI member Ad Networks, please go to the NAI Opt-Out [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) site and follow the instructions on that site. After you opt-out, you will still see advertisements from NAI member Ad Networks, but the advertising will not be tailored to your web preferences and usage patterns.

Google Analytics. The Website, App and Service may use Google Analytics, a website analysis service by Google Inc. (“Google”). Google Analytics uses cookies to analyze your use of the Website, App and Service. The information generated by the cookie about your use of the Website, App and Service is sent to and stored at a Google server in the U.S. Google will use this information to evaluate your use of the Website, App and Service, to compile reports on your activities for website operators and to provide other services related to Website, App and Service and Internet activities. Google will not associate your IP address with any other data held by Google. You can prevent the installation of cookies by adjusting the settings of your browser; however, if you do so, you may be unable to use all features of this Website, App and Service. Further, you can prevent the collection of data generated by cookies and related to the use of this website by downloading and installing the “plug-in” located at the following link: <http://tools.google.com/dlpage/gaoptout>.

Google AdSense. The Website, App and Service may use Google AdSense, a Google service to embed commercial information. Google AdSense uses cookies to analyze the use of the Website, App and Service. Further, Google AdSense also uses web beacons (invisible images). These web beacons help process information, such as visitor traffic, on the Website, App and Service. The information generated by cookies and web beacons about your use of the Website, App and Service (including your IP address) is sent to and stored at a Google server in the U.S. Google may also transfer this information to their contractual partners. However, Google will not associate your IP address with any other data stored at Google. You can prevent the installation of cookies by adjusting the settings of your browser; however, if you do so, you may be unable to use all features of the Website, App and Service. By using the Website, App and Service you agree to the processing of the collected information by Google, according to the above mentioned purposes.

## 10. Changes to Our Privacy Policy

We reserve the right to change, modify, add or remove portions of this Privacy Policy at any time and without prior notice, and any changes will become effective immediately upon being posted unless we

advise you otherwise. However, we will not use your Personal Information in a way that is materially different from the uses described in this Privacy Policy without giving you an opportunity to opt out. Your continued use of the Service after this Privacy Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of the Privacy Policy, as amended. We encourage you to bookmark this webpage and review this Privacy Policy regularly.

## **11. Contact Us**

If you have any questions regarding our Privacy Policy, you can contact us via email at [aparna@spoton.pet](mailto:aparna@spoton.pet).