

1. INTRODUCTION

This Privacy Policy explains how Geojet collects, uses, stores, discloses and otherwise processes your personal data (defined below), and your rights and choices regarding your personal data. It applies to the processing of personal data we collect about you when you use and interact with our websites that display or link to this Privacy Policy, register for an account and use our Services, visit our branded social media pages, register for, attend or take part in our events, webinars, or contests, or otherwise interact with us in person and/or by email, text message, instant messaging, telephonically, and by other electronic means.

Please read this Privacy Policy carefully. If you do not agree with the terms of this Privacy Policy, you should not use our website and the Services or otherwise provide us with your personal data. By using and/or accessing our website and the Services or otherwise providing us with your personal data, you acknowledge that you have read and understood this Privacy Policy. Your use of our websites and the Services is also governed by our Terms of Service.

This Privacy Policy is effective as of the date first set forth above. We may update this Privacy Policy from time to time. If we make changes, we will post the updated Privacy Policy on this page or another page that links to this page and change the date at the top of this webpage. We encourage you to look for updates and changes to this Privacy Policy by checking this date when you access our website. We will notify you of any modifications to this Privacy Policy that might materially affect the way we use or disclose your personal data prior to the change becoming effective by means of a message on this website, unless another type of notice is required by the applicable law. Your continued use of the website and our Services after we have posted changes to this Privacy Policy or notified you, if applicable, is deemed to be your acceptance of those changes.

2. KEY DEFINITIONS

- 2.1.** "Affiliates" means entities in our group who are listed in this Privacy Policy (please read the Affiliates section).
- 2.2.** "European Data Protection Law" means the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable national legislation implementing the GDPR.
- 2.3.** "Personal data" refers to any information relating to an identified or identifiable individual in the meaning of:
 - 2.3.1.** The European Data Protection Law, for individuals ("data subjects") in the European Economic Area (EEA) and the United Kingdom (UK) or when the European Data Protection Law otherwise applies;
 - 2.3.2.** For individuals residing in the State of California, the California Consumer Privacy Act 2018 (CCPA);
 - 2.3.3.** For individuals residing in other jurisdictions, the applicable legislation on personal data protection (e.g., LGPD – Lei Geral de Protecao de Dados in Brazil).
- 2.4.** "Privacy Policy" refers to this Privacy Policy.
- 2.5.** "Geojet", "we", "us" and/or "our" refers to Geojet Inc, unless specified otherwise.

- 2.6. “Services” refers to our Software as a Service professional service made available via our websites. “You” and “your” refers to the individual to whom personal data covered by this Privacy Policy relates.

3. INFORMATION WE COLLECT

We may collect data, including personal data, about you as you use our websites and Services or request our Services, and otherwise interact with us. Some of our website’s functionality can be used without providing any personal data, though for using some features of the Services, personal data is required. We process three broad categories of personal data:

- Information provided directly by you;
- Information received from third parties;
- Information collected automatically.

3.1. Information Provided Directly by You

- 3.1.1. Account registration. If you register with the Services through our website at <https://geojet.io>, or through a separate subscription agreement with us, then as part of such registration we will ask you to provide certain personal data, including your name, your company name, your email address and password. If you create an account or log into the Services using third-party services, such as Google, we will receive your name and email address as permitted by your profile settings on the third-party service in order to authenticate you. The information we receive when you authenticate through a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in the relevant third-party services to understand what data may be disclosed to us or shared with our Services.
- 3.1.2. Communication with Geojet. We collect personal data that you voluntarily give us when you contact us with inquiries (including by filling out relevant forms on our websites), engage with our chat bot on the website, respond to one of our surveys, contact our customer support regarding a problem you are experiencing with the Services or otherwise contact us regarding the website or the Services.
- 3.1.3. Transactions. We collect details of transactions you carry out using the Services including information you provide to enable us to fulfill your orders, which may include financial information such as your credit card number. As a paying user of the Services, we will receive your payment transaction details (for example, your name, the amount paid and the date of payment).
- 3.1.4. Payment Information. We collect payment and billing information when you register for certain paid Services. For example, upon registration we ask you to designate a billing representative, including name and contact information. You may also provide payment information, such as payment card details, which we collect via secure payment processing services. If you sign-up for a free trial account, you are not

required to enter your credit card information unless and until you decide to continue with a paid subscription to the Services.

- 3.1.5. Additional Payment Information. You may choose to provide additional information such as your VAT, additional billing address or name of the entity that you represent.
- 3.1.6. Identity Verification. In some cases (for example if you request a refund) we may ask you to provide us information such as your billing information (name, transaction ID, last 4 digits of the credit card associated with the account, billing date, etc.), email address, login name, and if needed, information that verifies your identity, in accordance with applicable law.
- 3.1.7. Testimonials. We collect and display personal testimonials of satisfied customers and users on the Services in addition to other endorsements. With your consent, we may post your testimonial, along with your name, on the Services. If you wish to update or delete your testimonial, you can contact us at privacy@geojet.io.

3.2. Information Received From Third Parties

We may obtain personal data about you from our authorized resellers or distributors, for example, if you purchase access to the Services through one of these partners. The personal data we may receive include business contact information, including mailing addresses, job titles, email addresses, phone numbers.

3.3. Information Collected Automatically

Like many other commercial websites, we use certain technologies, such as tools for collecting usage data, cookies, web beacons, pixels, and similar technologies, to automatically collect information that may contain personal data as you navigate our websites or use our Services

- 3.3.1. Device and Usage Data. When users come to our websites, we may track, collect, and aggregate information indicating, among other things, which pages of our websites were visited, the order in which they were visited, when they were visited, and which hyperlinks were clicked. We also collect information from the URLs from which you linked to our websites. Collecting such information may involve logging the IP address, operating system and browser software used by each user of the websites. We may be able to determine from an IP address a user's Internet Service Provider and the geographic location of his or her point of connectivity.
- 3.3.2. Third-Party Widgets. Some of our Services contain widgets and social media features, such as the Facebook button. You are the only person who decides if you would like to press this button and share your personal data with the respective third-party operators of widgets or social media. These widgets and features collect your IP address, the information about the page you are visiting during your use of the Services and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly within our Services. Your interactions with these features are governed by the privacy policy of the company

providing it and we recommend that you read them prior to sharing your data with such third parties.

3.3.3. Cookies and Similar Technologies.

3.3.3.1. Google Analytics. The Services use Google Analytics, a web analytics service of Google Ireland Limited (Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland). The use includes the "Universal Analytics" operating mode. This facilitates the assignment of data, sessions and interactions across several devices to a pseudonymous user ID and thus the analysis of a user's activities across devices.

3.3.3.2. Google Maps API. Geojet uses Google Maps API Services. If you are using our Services, by agreeing to our Privacy Policy you hereby also certify that you have read and agree to Google Maps/Google Earth Additional Terms of Service at https://maps.google.com/help/terms_maps/; and Google Privacy Policy at <https://www.google.com/policies/privacy/>. In addition to normal procedure for deleting stored data, you can revoke access to your data via the Google security settings page at <https://myaccount.google.com/permissions?pli=1>.

3.3.3.3. Conversion Tags. If you reach our website via our partner's Reference Link as described in our Affiliate program, we may use conversion tags, provided by Conversant LLC ("CJ Conversion Tags"), for the purposes of correct attribution of our partner's marketing activity and the performance of our Affiliate program. You will receive the notice about our use of the Cookies and similar technologies during your first visit of our partner's website including a request for your consent with use of CJ Conversion Tags. You are the only person who decides if you would like to provide this permission, and you can revoke your permission any time by contacting us at privacy@geojet.io. CJ Conversion Tags collect the following data relating to the order and/or the form completed on our website:

3.3.3.3.1. unique order ID;

3.3.3.3.2. quantity of each product purchased;

3.3.3.3.3. price of each product purchased;

3.3.3.3.4. currency of the transaction;

3.3.3.3.5. discount amount (if any);

3.3.3.3.6. coupon code used (if any);

3.3.3.3.7. marketing channel the sale is attributed to and a last click timestamp;

3.3.3.3.8. dynamic CJ event click token captured on landing page URL.

You can revoke your permission to process the data for the purposes described above by sending an e-mail to privacy@geojet.io.

4. HOW WE USE YOUR PERSONAL DATA

We use the personal data we collect, described above, as follows:

- 4.1.** To provide the Services and related support, process transactions, manage your user account and respond to your requests. This is necessary to perform the contract we are about to enter into or have entered into with you.
- 4.2.** As necessary for certain legitimate interests, including:
 - 4.2.1.** If we have not entered into a contract with you, to operate and administer our websites, to provide you with content you access and request (e.g., to download content from our websites), and to respond to your requests for our Services (including sharing your personal data with our resellers as necessary to respond to your request for the Services in an efficient manner and facilitate the sale of our Services, as described in the 'How We Share Your Personal Data' section below);
 - 4.2.2.** To manage our relationship with you, which includes sending administrative information to you, for example, information regarding the website and changes to our terms, conditions, and policies, and responding to you requests or communicating with you;
 - 4.2.3.** To analyze trends and track your usage of and interactions with our websites and Services in order to improve or enhance your experience by providing you with more relevant content and service offerings and help us develop new products and services (including to increase our Service's functionality, product features, and user-friendliness).
 - 4.2.4.** To prevent fraud or criminal activities, misuse of our products or services and ensure the security of our IT systems, architecture and networks;
 - 4.2.5.** To (a) comply with legal obligations and legal process; (b) respond to requests from public and government authorities, including public and government authorities outside your country of residence; (c) enforce our Terms of Service; (d) protect our operations; (e) protect our rights, privacy, safety of property, and/or that of you or others; and (f) allow us to pursue available remedies or limit the damages that we may sustain.
 - 4.2.6.** If you ask us to delete your data or to be removed from our marketing lists and we are required to fulfill your request, to keep basic data to identify you and prevent further unwanted processing.
- 4.3.** To send you updates and information about our new products and services, upcoming events or other promotions or news by email or push notification.

Where required by law we will only send you marketing information if you consent to us doing so at the time you provide us your personal data. You may opt-out of receiving such emails by following the instructions in each promotional email we send you or by updating your user settings. In addition, if at any time you wish not to receive future communications or you wish to have your name deleted from our mailing lists, please contact us at privacy@geojet.io. We will continue to contact you via email regarding the provision of our Services and to respond to your requests.

5. HOW WE SHARE YOUR PERSONAL DATA

Geojet will not sell, rent, lease or otherwise provide your personal data to others, except in order to provide you with the products and services you request and as further described below, or with your permission or as required by applicable law.

- 5.1. Service Providers. We may engage other companies and people to perform tasks on our behalf - meaning they are helping us provide our Services. In particular, we use third party providers of payment processing, fraud prevention, and risk assessment, hosting and other information technology services, email communication and customer support services, analytics, marketing, advertising and investor relations. Following our instructions, these parties may process your personal data in the course of providing the relevant services to us.
- 5.2. Resellers or Distributors. When you request Services from us or inquiry about the Services, we may share your personal data (name, last name and email address) with our authorized resellers or distributors as necessary to respond to your request for our Services in an efficient manner and facilitate the sale of our Services. Our resellers or distributors will process your personal data as separate data controllers and in accordance with their privacy policies. Please refer to the privacy policy of the applicable reseller for information on the reseller's privacy practices.
- 5.3. Social networking websites. Where permissible according to applicable law we may use certain limited personal data about you, such as your email address, to hash it and to share it with social network websites, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products or Services. The social network websites with which we may share your personal data are not controlled or supervised by us. Therefore, any questions regarding how your social network websites service provider processes your personal data should be directed to such provider.
- 5.4. Business Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of a service to another provider, your personal data and other information may be transferred to a successor or affiliate as part of that transaction.
- 5.5. Legal Requirements. We may share your personal data so that we can comply with a legal obligation to which we are subject, protect and defend the rights or property of Geojet, act in urgent circumstances to protect your personal safety or that of the public, or protect Geojet against legal liability. For example, where we are obliged to share your personal data with regulatory bodies which govern our work and services; government departments such as law enforcement, courts orders; financial institutions; external auditors; etc.

6. DATA RETENTION

We retain your personal data for as long as reasonably necessary to provide the Services and fulfil the transactions you have requested, complying with our legal obligations or for other legitimate business purposes, such as maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and

enforcing our agreements. After the applicable retention period has elapsed, your personal data will be anonymized and deleted.

7. HOW WE PROTECT YOUR PERSONAL DATA

We will use industry standard physical, technical, and administrative security measures to keep your personal data confidential and secure, and will not share it with third parties, except as otherwise provided in this Privacy Policy. The Internet, however, cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any personal data you provide to us. It is your responsibility to protect the security of your login information.

If you know or suspect that your personal data have been lost, stolen, misappropriated, or otherwise compromised, or in case of any actual or suspected unauthorized use of your Geojet account, please immediately contact us by email at privacy@geojet.io.

8. UPDATING AND ACCESSING YOUR PERSONAL DATA

You may access, review, modify and delete your account profile information by going to your account and editing your information. However, if you want to update, delete, limit the use or disclosure of, or access the personal data we hold about you in our systems, you will need to email your request to us at privacy@geojet.io. Please also read the “European Users” section for more information which may be applicable to you.

9. CHILDREN

Our Services are not directed to children who are under the age of 16. We do not knowingly collect personal data from children under the age of 16. If you have reason to believe that a child under the age of 16 has provided personal data to us through the Services, please contact us at privacy@geojet.io and we will endeavor to delete that information from our databases.

10. COUNTRY AND STATE SPECIFIC DATA PRIVACY INFORMATION

10.1. California Consumer Privacy Act.

If you are a California resident, please review our California Resident Privacy Policy for information regarding your California privacy rights.

10.2. European Users. This section applies to individuals in the EEA or the UK.

10.2.1. Who Controls My Personal Data? Geojet Inc. is a joint controller for your personal data collected when you use our websites and the Services. For the purposes of the GDPR and equivalent provisions of other applicable data protection laws.

10.2.2. Lawful Bases for Processing. This Privacy Policy describes the purposes for which your personal data is used and our lawful bases for such processing. Please refer to the “How We Use Your Personal Data” section above for more information.

10.2.3. What Rights Do You Have Regarding Your Personal Data? As the data subject, you have:

10.2.3.1. the right of access (Art 15 GDPR). If you ask us, we will confirm whether we are processing your personal data and, if

so, provide you with a copy of the personal data along with certain other details.

- 10.2.3.2.** the right to rectification (Art 16 GDPR). If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your personal data with others, we will tell them about the correction where possible.
- 10.2.3.3.** the right to erasure (Art 17 GDPR). You may ask us to erase your personal data in some circumstances, such as where we no longer need it or you withdraw your consent. If we shared your data with others, we will alert them to the need for erasure where possible.
- 10.2.3.4.** the right to restriction of processing (Art 18 GDPR). You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it (please read below for information on your right to object). We will tell you before we lift any restriction on processing. If we shared your personal data with others, we will tell them about the restriction where possible.
- 10.2.3.5.** the right to data portability (Art 20 GDPR). You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you, and that we processed with automated means. We will give you your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- 10.2.3.6.** the right to object (Art 21 GDPR). You may ask us at any time to stop processing your personal data, and we will do so:
 - 10.2.3.6.1.** if we are relying on a legitimate interest to process your personal data – unless we demonstrate compelling legitimate grounds for the processing or your data is needed to establish, exercise, or defend legal claims; or
 - 10.2.3.6.2.** if we are processing your personal data for direct marketing.
- 10.2.3.7.** the right to withdraw consent (Art 7 (3) GDPR). If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.
- 10.2.3.8.** the right to make a complaint with the data protection authority. If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to the data protection authority that is authorized to hear those concerns.

You may contact us at privacy@geojet.io to exercise your rights. Geojet Inc. will be responsible for responding to your requests, in accordance with the GDPR.

10.2.4. International Transfers of Personal Data. Geojet Inc. is based in the United States and other members of our group are based in countries outside the EEA or the UK. If you are accessing our websites and the Services from the EEA, the UK or other regions with laws governing data collection and use, please note that in connection with our business and for administrative, management and legal purposes, we may transfer your personal data from the country where you reside to Geojet Inc. in the United States and to other members of our group in the jurisdictions in which our affiliates are established and to our service providers in the United States. These countries may have data protection laws less stringent than or otherwise different from the laws in effect in the country in which you are located. Where we transfer your personal data as described above, we will take steps to ensure that your personal data receives adequate security protection where it is processed and your rights continue to be protected pursuant to the applicable data protection law, including through the use of Standard Contractual Clauses approved by the European Commission. In some cases, transfers of your personal data to us is necessary to perform the agreement we have entered into, or are about to enter into, with you. If you would like to receive more information on the safeguards that we implement as described above, please contact us as indicated below.

11. CONTACT INFORMATION

If you have any questions or concerns regarding Geojet's Privacy Policy or use of personal data, or if you want to exercise your rights regarding your personal data, please contact us by email at our designated request address at privacy@geojet.io or by regular mail to:

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