

INTOUCH WEBSITE AND MOBILE APPLICATION PRIVACY POLICY

PASSTIME is the maker of the InTouch product and service you have purchased through your dealer or lender. PASSTIME is committed to respecting the privacy rights of its visitors and other users of this PASSTIME or INTOUCH website or mobile application and all related pages, information, databases, materials and services (collectively, the "APP"). This Privacy Policy ("Privacy Policy") explains what information we obtain from you, how we use it, and how we protect it.

We created this Privacy Policy to give you confidence as you visit and use the APP, and to demonstrate our commitment to fair information practices and the protection of privacy. This Privacy Notice is only applicable to the APP, and not to any other websites that you may be able to access from the APP, each of which may have data collection and use practices and policies that differ materially from this Policy. OUR ONLINE INFORMATION COLLECTION AND USE PRACTICES MAY DIFFER FROM OUR PRACTICES REGARDING INFORMATION OBTAINED OFFLINE OR FROM OTHER WEBSITES.

Information We Collect

User Provided Information

The Application obtains the information you provide when you download and register the Application. Registration with us is optional. However, please keep in mind that you may not be able to use some or all of the features offered by the Application unless you register with us.

You are not required to provide any personally identifiable information to visit the Site. We collect personally identifiable information that can identify you, such as:

- i. Your login/user name and password to gain access to the APP
- ii. Your email and phone number, but only so we may respond to your queries through the APP with us.

We may collect personally identifiable information about you from various sources, including:

- i. Information provided by you such as, for example, information submitted via online forms which ask users to provide their names, e-mail addresses, and other information;
- ii. Information about your interactions with us or others;
- iii. Information we receive from third parties, such as an advertiser or other public or private data sources; and
- iv. Information we receive when you visit the INTOUCH WEBSITE.

In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application

Access by Minors

As part of our business practices, we do not knowingly collect information from individuals under eighteen (18) years of age. No information should be submitted to, or posted at, the APP by individuals under the age of eighteen (18) years.

How We Use Information We Collect

If you consent to use our APP services by registering to use them (clicking on the "I Accept" button), you consent, acknowledge, and agree to the InTouch APP Terms of Use and Privacy Policy. We may use the information we collect from you for any of the following purposes:

- i. to fulfill your requests for services (including but not limited to theft recovery), or follow up on requests previously made;
- ii. to contact you when necessary, including with regard to our services;
- iii. to review APP usage and operations;
- iv. to address problems with the APP, our business or our products and services; and
- v. to protect the security or integrity of the APP and our business.

Sharing of Information

PASSTIME will not share your personally identifiable information unless required to do so by law or in the good faith belief it is necessary to: (1) conform to the edicts of the law or comply with legal process served on PASSTIME; (2) protect and defend the rights or property of PASSTIME; or (3) act under exigent circumstances to protect the personal safety of its customers or the public.

- i. With our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement
 - ii. In the event that our business or substantially all of the assets of the business are acquired, your personally identifiable information may be one of the transferred assets if allowed under applicable law.
 - iii. You also acknowledge and agree that PASSTIME may continue to contact you for the purposes of communicating information with regard to the APP, and also to augment, facilitate, complete, and/or confirm any transaction that you may enter into or in order to respond to an inquiry or request made to us by you.
 - iv. Subject to the above, PASSTIME will use Confidential Information received from You or your Dealer/Lender only to perform its obligations under the Agreement and will not use Confidential Information for any other purpose.
 - v. PASSTIME will protect all Confidential Information in the same manner that is used to protect its own similar Confidential Information, and represents and warrants its compliance with all applicable requirements of state and federal laws and regulations governing the protection of consumer and other confidential information whether existing now or in the future.
- 1.** PASSTIME will at all times insure that all confidential information be maintained, safeguarded, and disposed of in a safe and secure manner pursuant to the requirements of applicable laws, rules and regulations, including 12 CFR §717, 748.

2. Furthermore, all confidential information shall be afforded all of the protections against unauthorized disclosure set forth in the Colorado Uniform Trade Secrets Act, C.R.S. Section 7-74-101 et. seq.

Online Tracking

We do not engage in the collection of personally identifiable information about an individual consumer's online activities over time and across third party Web sites or online services.

Modifying, Updating or Deleting Your Information

As part of the website request process, you may modify, update, or delete your information at any time prior to submitting any request to us.

You can also stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also delete your personally identifiable (other than login and password) by going on to the website.

Our Security Policy and Practices

PASSTIME is committed to protecting the confidentiality of your information and online transactions. We use 128-bit SSL encryption, the highest level of protection offered for Internet communications, to encrypt your data. We maintain physical, electronic and procedural safeguards designed to protect your personal information. We have security procedures in place to safeguard against loss, theft, unauthorized access, destruction, misuse, and modification of this information after we receive it. For example, PASSTIME encrypts all personally identifiable information within our database and restricts access to the information to our employees, agents and contractors who need to know such information to provide products or services to you.

Changes To This Privacy Policy

This Privacy Policy may be modified, edited, or materially changed from time to time. You will not be given any notice as to these modifications so be sure that you check the policy's Effective Date below each time you visit the site. Your continued use of the APP after any changes are posted will be deemed to constitute your agreement to and acceptance of such changes in this Privacy Policy.

Data Retention Policy, Managing Your Information

We will retain User-Provided data for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate. If you'd like us to delete User Provided Data that you have provided via the Application, please contact us at [redacted] and we will respond in a reasonable time. Please note that some or all of the User Provided Data may be required in order for the Application to function properly.

Your Consent

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," includes collecting, storing, deleting, using, combining and disclosing information. If you reside outside the United States your information will be transferred, processed and stored there under United States privacy standards.

How to Contact Us

If you have any questions regarding our privacy and security policies and practices, please email us at support@passtimegps.com and list "PRIVACY POLICY" in the subject line along with your name and address/phone number.

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