

ANJEL™ Privacy Policy

CURRENT AS OF: 15 September 2020

This Privacy Policy (“**Policy**”) describes the types of information Pluribus Inc. (doing business as “ANJEL™”) may collect from you or that you may provide when you use the ANJEL™ Personal Security System app (the “**Application**”), and the website www.anjel.tech (the “**Website**”) (collectively the “**Services**”) as well as our practices for collecting, using, maintaining, protecting, and disclosing that information. This Policy applies only to information that we collect from the Services, and not to information collected by us offline, through any third-party, or by any third-party that may be accessible or linked to or from the Services.

By accessing or using the Services, you agree to this Policy. If you do not agree with the terms of this Policy, do not use the Services or provide any information to us. This policy may change from time to time. Your continued use of the Services after any revisions we make to this Policy constitutes your acceptance and agreement to those changes, so please check the Policy periodically for updates.

HOW WE MODIFY THIS PRIVACY POLICY

ANJEL™ reserves the right to modify this Privacy Policy at any time, and without prior notice, by posting an amended Privacy Policy that is always accessible by clicking on the “Privacy Policy” link on this site’s home page. Your continued use of this site indicates your acceptance of the amended Privacy Policy. You should check the Privacy Policy through this link periodically for modifications by clicking on the link provided near the top of the Privacy Policy for a listing of material modifications and their effective dates.

Regarding Personal-Covered Information (defined below), if any modifications are materially less restrictive on our use or disclosure of the Personal-Covered Information previously disclosed by you, we will obtain

your consent before implementing such revisions with respect to such information.

THE TYPES OF INFORMATION WE COLLECT

Personal-Covered Information. ANJEL™ collects personal information that may be used to identify you, and covered information such as location data, screen names, and lists of contacts that you provide to us (“Personal-Covered Information”). Personal-Covered Information that ANJEL™ collects may vary with each separate purpose for which you provide it, and it may include one or more of the following categories: name, identity characteristics, physical address, email address, phone number, credit card information including credit card number, expiration date, and billing address, location data and the like.

Non-Personal Information. ANJEL™ may collect anonymous information such as your browser type, the URL of the previous website you visited, your computer’s operating system and Internet protocol (IP) Address, Internet domain and host name, your Internet Service provider, your clickstream data, and the dates and times that you may access this site and specific pages (Non-Personal Information). Non-Personal Information is essentially anonymous when collected; however, it is possible that Non-Personal Information could be used to identify you.

TECHNICAL AND GEOSPATIAL INFORMATION

ANJEL™ collects unique user identifier and location information through GPS, Wi-Fi, Bluetooth or via wireless network triangulation to identify your location as a part of providing our Service. If your location services are turned off for the application, ANJEL™ may be unable to locate you and the Service may not work properly. ANJEL™ may collect location data whenever location services are available to the app. ANJEL™ may use and share this information with others using the Service. ANJEL™ may receive information about you, including but not limited to geospatial data and demographic data, from third

parties such as, as permitted by law. ANJEL™ may use that information to personalize and enhance the Service.

PERSONAL-COVERED INFORMATION COLLECTED

ANJEL™ collects Personal Data that you provide directly to ANJEL™ and that is automatically collected in connection with your use of our Services. Personal Data may also be sent to us by third party business partners or service providers.

Personal Data may include (but is not limited to): member data/info, usage data/info, in-app activity data/info, marketing communications preferences and engagements, payment data/info (ANJEL™ uses third-party payment processors). This information is collected when you share the following with ANJEL™:

- Name (first, last)
- Email
- Phone Number
- Country/State of Residence
- Personal PIN code
- Device default language and default language preference for communication
- User Picture
- Audio and video of you (e.g. related to using the Service)
- Home Address
- Billing Address
- Physical, Physiological and Identity information
- Medical and health conditions
- Posts, data and images that members share
- Data from hardware devices
- Location Information (e.g. geographic coordinates)

WHAT ANJEL™ WILL NEVER DO WITH YOUR PERSONAL-COVERED INFORMATION

- Sell your personal-covered information to advertisers
- Share your personal-covered information with an external party (except with ANJEL™'s partners in order to provide the Service) without your consent.

HOW ANJEL™ USES YOUR PERSONAL DATA

ANJEL™ processes Personal Data to operate, improve, understand and personalize our Services. For example, ANJEL™ uses Personal Data to:

- Create and manage member profiles
- Use your (non-identifiable) data to enhance Services provided to you and other ANJEL™ users and to improve the accuracy of our Services
- Communicate with you about ANJEL™ Services
- Contact you about Services announcements, updates or offers
- Provide support and assistance for ANJEL™ Services
- Comply with our legal or contractual obligations
- Protect against or deter fraudulent, illegal or harmful actions
- Sharing Personal Information with our vendors and service providers who perform services on our behalf
- Enforce our Terms and Conditions of Use
- Additionally, we may communicate with you through the means you've provided us to do so

THE “SERVICES” USE THE FOLLOWING COOKIES

Essential Cookies: Essential cookies are required for providing you the features and services you have requested. For example, certain cookies enable you to log into secure areas of our Services. Disabling these cookies may make certain features and services unavailable.

Functionality Cookies: Functional cookies are used to record your choices and settings regarding our Services, maintain your preferences over time, and

recognize you when you return to our Services. These cookies help us to personalize our content based on your usage patterns, and remember your preferences (for example, your choice of language).

Performance/Analytical Cookies: Performance/Analytical Cookies allow us to understand how members use our Services, by collecting information on how often members use a particular feature of the Services. These aggregated statistics are used internally to improve the Services in a way that makes the Services interesting to as many members as possible. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising.

Analytics Service Providers: ANJEL™ uses third-party analytics (collectively, "Third Party Analytics Services") which are based on cookie and other similar technologies to analyze how you interact and engage with the Services so that we can learn and make enhancements to offer users a better experience (including by combining collected data and information with Personal Data). These Third Party Analytics Services will collect information about your use of the Services in order to evaluate your use of the Services, to compile reports (including through aggregating data and information with Personal Data), and to provide us with additional information regarding your Internet use. ANJEL™ may use Google Analytics to enhance the Service offerings of ANJEL™. Google's ability to use and share information collected by Google Analytics about your use of the Service is subject to the Google Analytics Terms of Use and the Google Privacy Policy. To opt out of Google's ability to use and share information collected by Google Analytics please visit <http://tools.google.com/dlpage/gaoptout>.

LEGAL CONSTRAINTS

ANJEL™ reserves the right to access, read, preserve, and disclose any information that we reasonably believe is necessary in response to a lawful

request by public authorities, including to meet national security or law enforcement requirements; enforce or apply our Terms and Conditions of Use and other agreements; or protect the rights, property, or safety of ANJEL™, our employees, our members, or others.

USER RESPONSIBILITIES

Your account is protected by password and/or smart phone biometrics for your privacy and security. If you access your account via a third-party site or service, you may have additional or different sign-on protections via that third-party site or service. You must prevent unauthorized access to your account and Personal Data by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your device by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Data we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of member information at any time.

PERSONAL DATA AVAILABLE TO USERS

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- Username and password
- Email address
- User profile information
- User content, including text, images and videos you have uploaded to the site

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at info@pluribusdata.com.

Children Under Thirteen (13) Years of Age: If you are a parent or guardian of a member of our Services who is under thirteen (13) years of age, you may contact us at any time to ask that (a) we stop collecting Personal Data from such member and (b) we delete any Personal Data already collected from such member. Please contact us at info@pluribusdata.com to request deletion of the account of an underage member. Be advised that we may ask for additional verification and documentation to confirm your identity and authorization to make this request.

California Residents: Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at info@pluribusdata.com

International Users: The Services are hosted on web servers in the United States. If you are accessing the Services from a non-U.S. location, your provision of personal information or other access to our Services constitutes your transfer of such data to the United States, a jurisdiction that may not provide a level of data protection equivalent to the laws in your home country.

GDPR Personal Privacy Rights: If you access the Services from the European Union or the United Kingdom, you have the right to:

- Request a copy of your personal data;
- Request corrections to your personal data;
- Request that we delete your personal data;
- Withdraw your consent for collection and processing of your personal data; and
- File a complaint with the data protection authorities in your home country if you believe your personal data privacy rights were violated.

To submit a request, please contact us at legal@pluribusdata.com

Pluribus Inc. complies with the EU-U.S. Privacy Shield Framework, as applicable and as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Pluribus Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [Privacy Shield Overview](#).

USER CHOICES

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features. You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Data after you update or delete it, but not in a manner that would identify you personally.

POLICY QUESTIONS

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to info@pluribusdata.com and we will attempt to resolve your concerns.